
Enforcement Response Plan

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King County

Department of
Natural Resources and Parks
Wastewater Treatment Division
Industrial Waste Program

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Acronyms and Abbreviations

CFR	Code of Federal Regulations
CIU	Categorical industrial user
CSO	Combined sewer overflow
DNFA	Determination of No Further Action
DNRP	Department of Natural Resources and Parks (King County)
Ecology	Washington State Department of Ecology
ECSS	Environmental and Community Services Section
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
IU	Industrial user
IW	Industrial waste
K.C.C.	King County Code
KCEL	King County Environmental Laboratory
KCIW	King County Industrial Waste Program
NPDES	National Pollutant Discharge Elimination System
NOV	Notice of Violation
OTAAC	Order to Appear at Conference
PIMS	Pretreatment Information Management System
POTW	publicly owned treatment works
PVIMP	Post-Violation Inspection and Monitoring Program
SEP	Supplemental Environmental Project
SIU	Significant industrial user
SMR	Self-monitoring report
SMT	Sampling and Monitoring Team
SNC	Significant Noncompliance
WAC	Washington Administrative Code
WTD	Wastewater Treatment Division (King County)
WWTP	Wastewater Treatment Plant

Definitions

The terms, words, and phrases, when used in this document, shall mean the following:

Confidence limit is the interval defined by variability (see “variability” definition below). The upper boundary is used as the defining limit of accuracy and precision. A measurement below the confidence limit indicates uncertainty.

Domestic user or **residential user** is any person who contributes wastewater into the metropolitan sewerage system or publicly owned treatment works (POTW) treatment plant from a residential dwelling unit.

Indirect discharge or **discharge** refers to the introduction of pollutants into a POTW from any non-domestic source regulated under section 307(b), (c), or (d) of the Clean Water Act.

Industrial user or **user** refers to a source or potential source of indirect discharge. The source shall not include “domestic user” as defined in this chapter. The term “company” is used interchangeably with the term “industrial user” in this document.

Industrial waste is any liquid, solid, or gaseous substance, or combination thereof, resulting from any process of industry, government agency, manufacturing, commercial food processing, business, agriculture, trade, or research, including, but not limited to, the development, recovery, or processing of natural resources, leachate from landfills or other disposal sites, decant water, contaminated non-process water, and contaminated stormwater and groundwater.

K.C.C. stands for King County Code.

Publicly owned treatment works or **POTW** is a treatment works as defined by Section 212 of the Clean Water Act (33 U.S.C. 1292), which, in this instance, is owned by King County. This definition includes any sewers that convey wastewater to the POTW treatment plant, but does not include any pipes, sewers, or other conveyances not connected to a facility providing treatment. In this document, “POTW” shall also include any sewers that convey wastewaters to the POTW from persons outside of the County who are, by contract or agreement with the County, users of the County’s POTW.

Significant industrial user is any industrial user, as defined in 40 CFR 403.3(t), including, but not limited to, all industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N, except as exempted by 40 CFR 403.3(v)(2), and any other industrial user that discharges an average of 25,000 gallons per day or more of process wastewater (excluding sanitary, noncontact cooling, and boiler blow down wastewater) to the metropolitan sewerage system or contributes a process waste stream that makes up 5% or more of the average dry weather hydraulic or organic capacity of a particular treatment plant or any other industrial user that is

designated as such by the County on the basis that the industrial user has a reasonable potential for adversely affecting the treatment plant's operation or violating any pretreatment standard or requirement (in accordance with 40 CFR 403.8(f)(6)). Per 40 CFR 403.3(v)(3), if an industrial user meeting the aforementioned criteria has no reasonable potential for adversely affecting the POTW's operation or violating any pretreatment standard, King County may determine that such industrial user is not a significant industrial user.

Significant noncompliance or **SNC** is as defined in K.C.C. Section 28.82.810.

Unusual occurrence refers to a suspected discharge into the sewer system from a known and/or unknown source that may be suspicious in nature or has the potential to impact worker safety, damage infrastructure, interrupt operation of a treatment plant, and/or negatively impact biosolids quality.

Variability refers to the inherent error associated with analytical measurements or procedures.

In addition to the aforementioned definitions, all definitions included in K.C.C. 28.82.010–1000 are hereby adopted by reference.

Chapter 1

Introduction

The King County Wastewater Treatment Division (WTD) serves approximately 1.84 million people within a 424-square-mile service area, which includes most urban areas of King County and parts of south Snohomish County and northeast Pierce County. The wastewater treatment system includes three regional wastewater treatment plants (WWTPs) (West Point in the City of Seattle, South Plant in the City of Renton, and Brightwater in unincorporated south Snohomish County); one small treatment plant and one community septic system on Vashon Island; another small treatment plant in the City of Carnation; four combined sewer overflow (CSO) treatment facilities in Seattle, with additional facilities in the planning or construction stage; over 391 miles of pipes; 25 regulator stations; 48 pump stations; and 39 CSO outfalls.¹

The King County Industrial Waste Program (KCIW) functions under WTD as a delegated industrial waste pretreatment program. KCIW administers and implements the County's pretreatment program. KCIW's duties include issuing approvals for discharging industrial wastewater to the sewer system, monitoring and sampling permitted industrial users, conducting routine compliance inspections, responding to complaints, referrals, and unusual occurrences and taking enforcement action when necessary.

As a delegated pretreatment program, KCIW must develop and implement an Enforcement Response Plan (ERP) as required by 40 CFR 403.8 (f)(5), Washington Administrative Code (WAC) 173-208, King County's National Pollutant Discharge Elimination System (NPDES) permits, and King County Code (K.C.C.) Chapter 28.84.060. This ERP fulfills that requirement.

1.1 Purpose

The purpose of this ERP is to implement the enforcement provisions of K.C.C. Chapter 28.84.060 as required by state and federal pretreatment regulations. The ERP contains procedures outlining how King County will investigate and respond to instances of industrial user noncompliance. The ERP ensures that violating conditions are corrected promptly, provides for consistent treatment of King County's industrial users, eliminates economic advantages for noncompliance, and allows King County to recover labor and material costs attributable to violations.

King County's general approach to enforcement actions is that enforcement actions are taken in an escalating manner and are meant to focus the efforts of industrial users on correcting violations. King County Code requires the recovery of costs incurred by King County due to the violations. King County enforcement actions are not intended as punitive measures. Penalties will be levied against (but not limited to) egregious violations, repeated violations, or violations

¹ Information on WTD's service area and system is based on 2020 figures.

that result in significant noncompliance (SNC), as defined in K.C.C. Section 28.82.810. This ERP affords industrial users fair notice and an appeal process.

1.2 Applicability

This ERP applies to all nondomestic (nonresidential) users that discharge, or have the potential to discharge, industrial wastewater directly or indirectly into any public sewer, private sewer, or side sewer tributary to the King County sanitary sewer system. When implementing the ERP, KCIW focuses on those facilities with greater potential to adversely impact the sanitary sewer system and operations of KCIW's WWTPs. Such facilities will typically hold King County-issued Waste Discharge Permits or Discharge Authorizations. K.C.C. 28.84.060.B defines nondomestic users. King County Code further defines such terms as "industrial waste," "industrial user," and "significant industrial user" in K.C.C. 28.82.010, "Definitions." These definitions are also provided in the "Definitions" section of this document. For the sake of clarity and consistency, references to "industrial users," "companies," or "industrial waste dischargers" in the ERP are understood to refer to all nondomestic users, as defined in K.C.C. 28.84.060.B.

1.3 Regulatory Authority

King County's legal authority to enforce federal, state, and local regulations relating to the discharge of industrial wastes to any of King County's WWTPs is based on delegated authority by the Washington State Department of Ecology (Ecology) in accordance with WAC 173-208 and K.C.C. 28.84.060. The sections of King County Code that pertain directly to enforcement are K.C.C. 28.84.060.N, "Violations," and K.C.C. 28.84.060.O, "Penalties and Enforcement." In accordance with Revised Code of Washington 35.58.360, actions to impose or enforce penalties may be brought in the superior court of Washington State in and for King County.

K.C.C. 28.84.060 establishes the DNRP Director, or their delegated agent, as the responsible party for taking enforcement action. The DNRP Director has delegated this authority to the WTD Director and Industrial Waste Program Manager in accordance with the Delegation of Authority for Industrial Waste Rules and Regulations (see Table 5 in Chapter 6 of this document). Enforcement actions shall be signed in accordance with the Delegation of Authority for Industrial Waste Rules and Regulations in effect at the time the enforcement action is issued.

Chapter 2

Enforcement Response Plan Requirements

This chapter lists the elements required for an ERP by state and federal rules. For each required element listed, the appropriate reference chapter in this document is given where more details can be located.

2.1 Federal ERP Requirements

40 CFR Part 403.8(f)(5) states that the POTW (King County) “shall develop and implement an enforcement response plan.” The section further states that this plan “shall contain detailed procedures indicating how a POTW will investigate and respond to instances of industrial user noncompliance.”

40 CFR Part 403.8(f)(5) has four subsections: i–iv. These subsections, including the required ERP elements, are as follows:

- **403.8(f)(5)(i):** “Describe how the POTW will investigate instances of noncompliance.”

KCIW procedures for investigating instances of noncompliance are discussed in detail in Chapter 3 of this document, which includes the following elements:

- KCIW monitoring activities
 - Industrial waste pretreatment inspections
 - Self-monitoring reports (SMRs) review
 - Unusual occurrences and complaints investigations
- **403.8(f)(5)(ii):** “Describe the types of escalating enforcement responses the POTW will take in response to all anticipated types of industrial user violations and the time periods within which responses will take place.”

Chapter 5 of this document discusses KCIW’s enforcement responses and timelines to industrial users’ violations in detail, including information regarding the following elements:

- Enforcement Action Responses
 - Verbal Notification
 - Warning Letter
 - Notice of Violation (NOV)
 - Determination of No Further Action (DNFA)
 - Post-Violation Inspection and Monitoring Program (PVIMP) for Cost Recovery Assessment(s)
 - Increased Self-Monitoring Requirements

- Final Notice
 - Compliance Orders
 - Increased Permitting Level
 - Monetary Penalties
 - Economic Benefit for Noncompliance
 - Assessment(s) for Damage
 - Total Payment
 - Order to Appear at Conference (OTAAC)
 - Cease Discharge Notice
 - Emergency Suspensions
 - Revocation of Permit or Authorization and Termination of Discharge
 - Public notification of violations
 - Criminal Prosecution
- Timelines for Enforcement Action Responses
 - Discharge Violations – King County Monitoring
 - Discharge Violations – Self-Monitoring
 - Permit & King County Code Violations
 - Reporting Violations
- **403.8(f)(5)(iii):** “Identify (by title) the official(s) responsible for each type of response.”

Chapter 6 of this document lists the King County officials responsible for each type of response.

- **403.8(f)(5)(iv):** “Adequately reflect the POTW's primary responsibility to enforce all applicable pretreatment requirements and standards, as detailed in 40 CFR 403.8 (f)(1) and (f)(2).”

This subsection is addressed in the KCIW rules and regulations, which can be found in [K.C.C. 28.84.060](#).

2.2 Washington State ERP Requirements

Washington State rules, as codified in WAC 173-208-090, require a delegated program, and hence its ERP, to conform with department (Ecology) rules. This ERP, in conjunction with King County’s other elements of its delegated pretreatment program, conforms with Washington State rules as detailed below and elsewhere in WAC 173-216 and WAC 173-240.

WAC 173-208-090 – Conformity with department rules.

(3) Any municipality granted authority hereunder to administer a permit program shall adhere to, as a minimum requirement for commercial and industrial dischargers, the state or federal pretreatment standards and regulations, as now exist or are hereafter amended. If necessary to impose more stringent standards in order to meet the effluent limitations

contained in its NPDES permit, the municipality shall impose and enforce such stricter pretreatment requirements as necessary to meet these limitations pursuant to the authority preserved to the state by section 510 of the FWPCAA.

Chapter 3

Identifying and Investigating Instances of Noncompliance

The Director and designees are authorized under K.C.C. 28.84.060 to permit, inspect, sample, monitor, investigate, and conduct surveillance monitoring of industrial users that discharge, or have the potential to discharge, industrial wastewater directly or indirectly into any public sewer, private sewer, or side sewer tributary to the King County sanitary sewer system. Compliance sampling events, surveillance monitoring, inspections, industrial users' self-monitoring data review, and investigations may be conducted in response to routine compliance monitoring and permitting activities, referral or complaint, spills or slug discharges, unauthorized discharges, or for classifying an industrial user. Permitting, inspecting, and sampling activities shall be conducted in accordance with K.C.C. 28.84.060.

KCIW will initiate enforcement actions, as described in this ERP, when noncompliance with any pretreatment standards and/or requirements have been documented. Any person that is a nondomestic user of the King County sanitary sewer system, whether issued a KCIW permit or authorization or not, must comply with KCIW rules and regulations and applicable wastewater regulations.

3.1 POTW Monitoring

KCIW has a Sampling and Monitoring Team (SMT) comprised of compliance specialists whose primary responsibility is to collect representative and defensible samples of industrial user effluent. (See Chapter 6 for additional details on SMT structure.) All significant industrial users (SIUs), except for mid-tier categorical industrial users (CIUs), are sampled at least once per year. Mid-tier CIUs are sampled at least biannually. Based on a number of factors, some SIU's effluents are sampled at a greater frequency.

Samples are analyzed at the King County Environmental Laboratory (KCEL). Sample results are maintained in the KCEL Laboratory Information Management System and transferred to KCIW's Pretreatment Information Management System (PIMS) database for review and compliance verification. Data are quality controlled and assured by the lab. KCIW SMT conducts field analyses for some approved parameters. While performing compliance sampling, and to maintain the integrity of the collected sample(s), SMT staff follow documented sampling standard operating procedures, including chain-of-custody procedures, sample preservation requirements, and proper transport and delivery to KCEL. KCEL adheres to analytical standards and holding times set forth in 40 CFR Part 136.

Once data are submitted to PIMS, they are reviewed by SMT staff and processed for compliance verification. A Compliance Investigator reviews the data and verifies that PIMS properly

compared the data to permit limits as derived from King County Local Limits, categorical pretreatment standards, state standards, or limits developed on a case-by-case basis. Sample results that do not meet the applicable standards are automatically flagged by the database system. Based on the results, the Investigator verifies the violation and takes appropriate enforcement action such as, but not limited to, issuance of an NOV. All NOVs require that the industrial user submit a corrective action report (14-day report). (Please see the Section 3.5, “14-Day Report,” at the end of this chapter for report requirements).

3.2 Self-Monitoring Reports

Each SIU is required to periodically sample its effluent. The sampling frequency depends on the nature of the operation, characteristics of the wastewater, the volume of regulated wastewater discharged, and the pretreatment system in use. The SMR receipt date and compliance data are entered into PIMS where a Compliance Investigator can review the information and compare it to applicable standards as specified in the permit or discharge authorization. Sample results that do not meet the applicable standards are automatically flagged by the database system. If the data meet all requirements, no action is taken. If the data conclusively exceed applicable pretreatment standards, the industrial user is required to investigate the cause of the noncompliance, detail the corrective actions taken to prevent recurrence, collect an additional sample for the violating parameter(s), and submit their findings in a report due within 14 calendar days of the permittee learning of the violation. (Please see the Section 3.5, “14-Day Report,” at the end of this chapter for report requirements).

Next, a Compliance Investigator receives and reviews the 14-day report and sends a warning letter to the industrial user acknowledging receipt of the 14-day report, describing the cause of noncompliance and the corrective actions taken by the industrial user to respond to the violation and ensure ongoing compliance. KCIW may require additional information or re-submission of the 14-day report if not satisfied that the corrective actions listed in the report are adequate to ensure future compliance. If the industrial user reports a violation for the same parameter or cause of violation in subsequent SMRs, indicating that the industrial user has not rectified the noncompliance, KCIW will initiate enforcement actions.

3.3 Inspections

KCIW Compliance Investigators inspect each SIU at least once per year. Other industrial users who hold major or minor discharge authorizations are inspected less frequently, at a minimum of once every 5 years. A Compliance Investigator inspects the sampling location/compliance point, flow measurement systems, pH, and other on-site field measurement systems, the pretreatment system(s), chemical storage, and other general best management practices. The Compliance Investigator also reviews monitoring, maintenance, and laboratory records and procedures; activities and processes generating wastes; and waste disposal records, and verifies compliance with the terms and conditions of the KCIW control document, such as a waste discharge permit. The Compliance Investigator then completes a wastewater compliance inspection checklist, documents the findings, and includes photographs, as appropriate.

When possible, deficiencies discovered are addressed at the time of the inspection. If appropriate, a follow-up letter requiring corrective actions is sent to the industrial user. Based on the nature, severity, and recurrence of noncompliance, KCIW may request that the industrial user submit a corrective action letter or issue a warning letter or NOV initiating formal enforcement actions.

3.4 Unusual Occurrences, Referrals, and Complaints

King County WWTP operators and off-site field staff report any unusual occurrences in the sewer system and at the treatment plants to KCIW. KCIW may follow up with an investigation, which may include surveillance monitoring at appropriate maintenance holes, inspections, and interviews with industrial users who are potential sources of noncompliance or written notices, as appropriate. KCIW will also respond to referrals and complaints submitted by industrial users, regulatory agencies, the public, and local sewer agencies, and may take reasonable enforcement action, when appropriate.

3.5 14-Day Report

Industrial users are required to submit a 14-day corrective action report to KCIW when requested by KCIW upon determination that a violation has occurred or when self-monitoring compliance activities indicate noncompliance. This report must include the following elements:

- Description of the noncompliance event
- Cause of noncompliance event
- Date and time King County was informed
- Corrective actions taken
- Follow-up sample collection and results, if applicable

Chapter 4

Classification of Violations and Enforcement Considerations

K.C.C. 28.84.060.O.1 states that “Any person failing to comply with or violating any of this section shall, for each failure or violation, or for each day that the failure or violation occurred or continues to occur, be required to correct such violation and shall be subject to enforcement action or actions to be determined by the director. Depending on the severity of the situation, the director may require the immediate cease of discharge and disposal of the industrial waste in some manner other than into the public sewer, private sewer, or side sewer tributary to the metropolitan sewerage system, at the expense of the person responsible for the failure or violation.”

In determining the type of enforcement action and the amount of penalties to be levied for discharge, permit, King County Code, and/or reporting violations, KCIW considers, at a minimum, the type and concentration of the pollutant causing the violation, the associated analytical variability, the volumes discharged, the damages caused by or related to the discharges, the volumes or pollutant loading discharged, the history of past violations by the same industrial user, SNC status, industrial user culpability, economic benefit for noncompliance, the assessment of any prior penalties for similar violations, and the number of violations.

4.1 Violations Classification

For enforcement purposes, violations are classified as follows:

- Discharge Violations
- Permit Violations
- King County Code Violations
- Reporting Violations

Different enforcement procedures are used depending on the class of violation. The DNRP Director reserves the right to take any, all, or any combination of enforcement actions against a noncompliant user as defined in K.C.C. 28.84.060.O.2.i, “Remedies Non-Exclusive.” King County will pursue enforcement actions in the following instances:

Discharge Violations: A discharge violation will be considered to have occurred if the limits established in or in accordance with this section, federal or state pretreatment standards, specific requirements of an industrial waste discharge permit, written discharge authorization, or any

other pretreatment standards are exceeded, regardless of intent or accident. When considering the enforcement action for a discharge violation, KCIW considers the analytical variability for the violating pollutant. A mass violation will be considered to have occurred if mass-related limitations for specific pollutants are exceeded.

Permit Violations: KCIW issues a variety of control documents including but not limited to individual waste discharge permits, general permits, major and minor discharge authorizations, and letters of authorization. A permit violation will be considered to have occurred if any condition(s) contained in a control document such as special conditions, best management practices, or general conditions are not complied with.

Violations of K.C.C. 28.84.060: A King County Code violation will be considered to have occurred if requirements established by K.C.C. 28.84.060, written orders from the director, or public rules are not complied with. The violations include, but are not limited to, failure to obtain discharge approval, failure to pay sewer charges or fines, failure to complete the requirements of a compliance order or meet the deadlines of a compliance schedule, or violations of established public rules.

Reporting Violations: A reporting violation will be considered to have occurred if reporting requirements established by an issued permit or authorization, special reporting requirements established by compliance order, other reporting requirements established by a written document from the director or specified by general federal pretreatment standards in 40 CFR 403.12 as amended are not complied with.

4.2 Enforcement Considerations

Instances of noncompliance may range from relatively minor violations (such as reports submitted a few days late, but having no effluent violations) to major violations, such as discharges that cause King County to have an NPDES violation or a decrease in biosolids quality. Each instance of noncompliance is a violation that is reviewed and appropriately addressed. The enforcement response to each violation is based on the severity and duration of the violation, the discharge history of the industrial user, the enforcement history for the industrial user, the good faith or culpability of the industrial user, the potential or actual harm caused by the violation, and the SNC status of the industrial user. The enforcement procedures are designed to ensure that the proper enforcement response will be selected considering the following factors:

Severity and Duration of the Violation: Discharge violations are evaluated with respect to the applicable pretreatment standard (K.C.C. 28.82.040, “Applicable Pretreatment Standard”). Ratings of discharge violations reflect the relative magnitude of the violation. For permit and K.C.C. 28.84.060 violations, the magnitude of the violation is evaluated with respect to the potential to cause a discharge violation at the facility. In addition, reporting violations are evaluated based on the timeliness of the report and SNC status.

Potential for Industrial User’s Waste to Cause a Problem: This is evaluated by determining the industrial user’s actual or permitted flow to the sewer system and if the waste contains non-compatible pollutants. (See the definition of “compatible pollutants” in K.C.C. 28.82.130.). The discharge of non-compatible pollutants and high-volume discharges increases the potential for an industrial user's waste to interfere with the POTW or pass-through of pollutants.

Discharge History of the Facility or Permitted Site: The more frequent the violations are over the previous 3-year period, the more severe the penalty. Several violations in the preceding 6-month period from the date of the current violation, or an acute problem with controlling the pollutants in the discharge, may place an industrial user in SNC.

Enforcement History of the Facility or Permitted Site: Industrial users who have received enforcement actions from KCIW within the last year will be subject to escalating enforcement actions and/or larger penalties.

Good Faith Status of the Industrial User: Companies that, following the receipt of an NOV, correct their discharge violations before King County's initial post-violation inspection and sampling events, may receive minimal additional enforcement action. If the problem has been corrected at the time of the investigation or the industrial user has taken initiative to correct violations found during self-monitoring, this is taken as an indication of good faith. Companies are culpable when the cause of a violation was the result of a mistake, accident, or omission; when they knowingly continue to violate; or when they fail to establish appropriate systems to detect and prevent a violation.

Increased culpability occurs in either of the following situations: (a) when an industrial user knowingly violates a pretreatment standard or requirement and (b) when an industrial user violates a pretreatment standard or requirement because of negligence or ignorance of the violation, causing the violation to continue. Culpability also increases when King County must inform an industrial user of a violation or trace the violation back to its source when self-monitoring should have detected the violation. King County will also evaluate whether the company has accurately reported its noncompliance and will evaluate the amount of previous enforcement communication with the industrial user.

Potential or Actual Harm Caused by the Violation: King County will evaluate whether the discharge caused or could have caused an NPDES violation, a violation of regulatory standards for biosolids quality, slug loading at the treatment plant, harm to the receiving waters, or any health hazards at the treatment plant or in the collection system. King County will also evaluate whether the discharge caused or could have caused increased costs associated with biosolids reuse, effluent reuse, or discharge of effluent. The industrial user will not be excused if the damage did not actually occur. The potential for damage will be evaluated and is all that is required to be established.

Significant Noncompliance Status: King County will review the industrial user's violation and enforcement history to determine whether the industrial user is in SNC. SNC criteria are those severe or chronic violations that include, but are not limited to, interference or pass-through, late reporting violations, and actions that adversely affect the operation or implementation of King County's Pretreatment Program. SNC is defined in K.C.C 28.82.810; more details are provided in the "Significant Noncompliance" section of "Industrial Waste Enforcement" chapter of the King County Industrial Waste Procedures Manual.

Questionable Discharge Violations: When a violation of an applicable pretreatment standard (limit) has occurred, but King County questions the accuracy of the testing method or new data brings the purpose or effectiveness of an established limit into question, King County recognizes

that routine enforcement procedures may not be appropriate. In these cases, the questionable nature of the violation or limit will be considered in the enforcement response. As these situations arise, the Industrial Waste Program will develop procedures to ensure consistent treatment of all industrial users.

Chapter 5

Enforcement Actions: Responses and Time Periods

5.1 Enforcement Action Responses

King County's enforcement actions include verbal notifications, warning letters, NOV's, DNFA's, compliance orders, requirements for additional self-monitoring, assessments of PVIMP charges, final notices, OTAACs, monetary penalties (fines), assessments for damage, supplemental environmental projects, suspension of permit or authorization, termination of discharge, emergency suspension of discharge, revocation of permit or authorization, and referrals for criminal prosecution. Penalties are escalated if a violation continues or becomes worse, if the industrial user is not making a good faith effort to correct the problem, or the industrial user knowingly violates King County regulations. The following are summaries of King County's enforcement actions (complete definitions are provided in K.C.C. 28.84.060.J.8 and J.9, "Permits and Authorizations," and K.C.C. 28.84.060.O, "Penalties and Enforcement"):

Verbal Notification: A verbal conversation used to inform the industrial user of a missed deadline or a potential violation. A verbal notification may be an initial or follow-up action to attempt to remedy minor administrative violations without further or escalating enforcement action.

Warning Letter: A letter or e-mail sent to inform the industrial user of a missed deadline or a potential violation. A warning letter is used to inform an industrial user that they can avoid formal enforcement action if they immediately remedy a problem. Warning letters are used, for example, if an industrial user fails to address a specific permit condition or in response to self-reported violations (permit or discharge). A warning letter is meant to be the final step taken by KCIW to bring the industrial user back into compliance before initiating enforcement actions. Issuance of a warning letter is not meant to be a prerequisite to taking any other action against the industrial user.

Notice of Violation: Written notification of the violation to the industrial user. The notice includes a description of the violation and requires that the industrial user respond within 14 calendar days with a written explanation for the violation and corrective actions taken. For discharge violations, the industrial user must resample and include results in the 14-day report.

Determination of No Further Action: Written notification to the industrial user in response to a NOV establishing that no further enforcement action, other than the assessment of PVIMP costs, is warranted at this time to ensure a return to compliance. DNFA's can be issued when

- the violating condition has ceased or was corrected promptly by the industrial user.
- the industrial user has returned to compliance.

- the violation did not place the industrial user in SNC.
- the violation was minor, and the industrial user has a good compliance history.

Post-Violation Inspection and Monitoring Program Cost Recovery Assessment(s): Billing for additional sampling and inspections by KCIW that are required in order to investigate the reason for a violation or to ensure a return to compliance. Additional PVIMP invoices may be sent as appropriate for the violation.

Increased Self-Monitoring Requirements: Permanent or temporary increases in the amount of self-monitoring required. This may be part of a compliance order, an NOV, or control document.

Final Notice: Notice that failure to complete actions such as filing a report, making upgrades to pretreatment systems, or subsequent violations will result in fines.

Compliance Orders: Order directing the industrial user to come into compliance by taking or completing listed actions within a specified time period.

Increased Permitting Level: In response to instances of noncompliance or where the industrial user has demonstrated that the current permitting document is no longer appropriate to ensure continued compliance, KCIW will issue a new control document that has a higher level of oversight. Industrial users found to have adversely affected the POTW's operations or for violating pretreatment standard(s) or requirement(s) are evaluated for SIU status.

Monetary Penalties: Fines for violations. These civil penalties do not include any assessment for damages.

Economic Benefit for Noncompliance: Estimated amount based on the industrial user's economic benefit of noncompliance may be recovered.

Assessment(s) for Damage: Assessments for the costs King County has incurred due to the violation and the monetary gains the industrial user received from noncompliance. For example, assessments to recover costs for tracking down the violator increased operational costs at King County's treatment plants (including such costs as increased biosolids disposal costs or NPDES permit violation fines), damage to King County POTW infrastructure, the loss of state or federal funds to King County, or the money saved by the industrial user when waste is discharged to the sewer instead of properly disposed.

Total Payment: Sum of the monetary penalties, cost recovery, and assessment(s) for damages.

Supplemental Environmental Project: Voluntary project proposed by an alleged violator which provides tangible environmental or public health benefits to the affected community or environment. The project may be considered if there is an appropriate relationship or "nexus" between the nature of the violation and the environmental benefits to be derived from the type of supplemental project. SEPs must go beyond what is required under federal, state or local laws. King County may approve an SEP based on development of public rules that establish the considerations and acceptance criteria.

Order to Appear at Conference: A compliance order to an industrial user to appear before KCIW staff to explain why King County should not modify, suspend, or revoke the user's waste discharge permit or discharge authorization. During the proceeding, the industrial user may receive an order from King County directing the user to take specific action to resolve the violation, which, if carried out, could eliminate the need to modify, suspend, or revoke the industrial user's permit. King County uses the OTAAC for repeated discharge violations, failure to comply with required actions as stipulated in a King County Compliance Order or other directive, and for serious or prolonged Administrative Violations.

Cease Discharge Notice: Order to cease discharge violations and take preventative action to stop violations, which may include suspension of nondomestic discharge to the sanitary sewer.

Emergency Suspensions: Immediate suspension of an industrial user's discharge when the discharge presents a danger to human health. Suspension of an industrial user's discharge will occur in a timeframe determined by King County after notification and an opportunity to respond when the discharge presents a danger to the environment or interferes with treatment plant operation.

Revocation of Permit or Authorization and Termination of Discharge: Revocation of the right to use the sanitary sewer to dispose of nondomestic waste. King County uses a Termination of Discharge or Permit Revocation when an industrial user's discharge endangers public health, the environment, public sewers, or King County WWTPs or in cases where other administrative enforcement procedures have proven unsuccessful. This is the most severe penalty King County can impose.

Public Notification of Violations: KCIW will publish in a newspaper of general circulation within King County, a minimum of once every 12 months, a list of those industrial users that since the last publication were determined to be in SNC or were issued a penalty. This notification will summarize enforcement actions taken by King County during the same period covered by the publication.

Criminal Prosecution: Where criminal remedies appear warranted, the WTD Director, in consultation with KCIW and King County's Prosecuting Attorney's Office, may refer the case to state and federal authorities for criminal prosecution.

5.2 Enforcement Action Response Time Periods

Table 1. Discharge Violations – King County Monitoring – Time Period and Response

Time Period*	Action
Start	KCIW discovers a discharge violation through its sampling program.
~4-6 days	Investigator notifies the IU of violation(s) and imminent issuance of NOV. Investigator signs and issues an NOV. (a)
~15-25 days	Investigator receives & reviews 14-day report from IU. (b) Investigator conducts PVIMP inspection. Specialist conducts PVIMP sampling for parameter(s) of concern.
~10-20 days	Investigator receives & reviews PVIMP sample data, confirms compliance status, and calculates SNC status.
~10-20 days	Investigator drafts enforcement action and begins internal review. (c)
~2-5 days	Investigator finalizes enforcement action and notifies IU.
~2-3 days	IW Program Manager signs and issues the enforcement action.
Required Action(s) due date(s)	If compliance is not achieved or IU fails to abide by terms of enforcement action, KCIW escalates the enforcement action as follows:
~2-3 days	Investigator makes inquiry on delinquent items and informs IU of pending issuance of OTAAC. Failure to appear at OTAAC results in KCIW initiating a permit or discharge authorization suspension or revocation.
~5-10 days	IW Program Manager issues OTAAC.
OTAAC date	Hold OTAAC meeting.
~5-10 days	IW Program Manager signs and issues OTAAC meeting summary letter, including required compliance actions and timelines, if appropriate.
OTAAC Required Action(s) due date(s)	If compliance is not achieved or IU fails to abide by terms of OTAAC meeting, KCIW further escalates the enforcement action as follows:
~5-10 days	Investigator sends written notice informing IU of pending permit or discharge authorization suspension or revocation.
30 days after IU has been informed	IW Program Manager suspends, or WTD Director revokes, the IU's waste discharge permit or discharge authorization.

* Time period represents a range of days when an action is to be completed. The time period begins when the previous action is complete. For example, the investigator completes the action in the second row (i.e., notifies the IU of violations and imminent issuance of NOV and signs and issues an NOV) within ~4-6 days from completion of the previous action (i.e., KCIW discovers a discharge violation through its sampling program), and so on.

- (a)** The NOV requires that the IU submit a 14-day report providing an explanation for the violation, corrective actions taken, and results from the IU's required resample of their effluent for the violating parameter(s).
- (b)** If the IU fails to submit the required 14-day report by the due date, KCIW follows the enforcement actions outlined in Table 4 of Section 5.2 of this document.

(c) KCIW determines the appropriate level of enforcement action based on the enforcement considerations outlined in Section 4.2 of this document. Enforcement action options available to KCIW are described in detail in Section 5.1 of this document.

General Processing Notes

- Days in the timeline are business days and represent processing goals. Deviations from these timelines can be expected at times for various reasons, including, but not limited to, staff availability, workload demands, and competing special projects.
- During this process, the IU may request and KCIW may grant extensions, which would result in deviations from the timelines listed above.
- Maintaining verbal and written communication with the IU throughout this process is recommended to reduce the timeline and number of escalation steps necessary to obtain compliance.

Table 2. Discharge Violations – Self-Monitoring – Time Period and Response

When appropriate, KCIW control documents include self-monitoring and reporting requirements for pollutants of concern. Permittees are required to notify King County of self-monitoring discharge violations within 24 hours of learning of the violation. Following the violation, a corrective action report, known as a “14-day report,” is due within 14 calendar days of the permittee becoming aware of the violation. The 14-day report requires the permittee to provide an explanation for the violation, corrective actions taken, and results from the industrial user’s required resampling of their effluent for the violating parameter(s). When an investigator receives a 14-day report for a self-monitoring violation, they respond with a warning letter acknowledging its receipt, summarizing the reported violation and corrective action(s), and placing the IU on notice that KCIW will initiate enforcement actions if violations for the same parameter or cause of violation continue to occur in subsequent reporting periods.

Time Period*	Action
Start	Investigator requires and receives a 14-day report for a self-monitoring violation that KCIW has determined requires enforcement action. (a)(b)
~4-6 days	Investigator notifies IU that KCIW is initiating enforcement action for repeated self-reported violations.
~15–25 days	Investigator conducts PVIMP inspection. Specialist conducts PVIMP sampling for parameter(s) of concern.
~10–20 days	Investigator receives & reviews PVIMP sample data, confirms compliance status, and calculates SNC status.
~10–20 days	Investigator drafts enforcement action and begins internal review. (c)
~2–5 days	Investigator finalizes enforcement action and notifies industrial user.
~2–3 days	IW Program Manager signs and issues the enforcement action.
Required Action(s) due date(s)	If compliance is not achieved or IU fails to abide by terms of enforcement action, KCIW escalates the enforcement action as follows:
~2–3 days	Investigator makes inquiry on delinquent items and informs IU of pending issuance of OTAAC. Failure to appear at OTAAC results in KCIW initiating permit or discharge authorization suspension or revocation.
~5–10 days	IW Program Manager issues OTAAC.
OTAAC date	Hold OTAAC meeting.
~5–10 days	IW Program Manager signs and issues OTAAC meeting summary letter including required compliance actions and timelines, if appropriate.
OTAAC Required Action(s) due date(s)	If compliance is not achieved or IU fails to abide by terms of OTAAC meeting, KCIW further escalates the enforcement action as follows:
~5–10 days	Investigator sends written notice informing IU of pending permit or discharge authorization suspension or revocation.
30 days after IU has been informed	IW Program Manager suspends, or WTD Director revokes, IU’s waste discharge permit or discharge authorization.

Time period represents a range of days when an action is to be completed. The time period begins when the previous action is complete. For example, the investigator completes the action in the second row (i.e., notifies IU that KCIW is initiating enforcement action for repeated self-reported violations) within ~4-6 days from completion of the previous action (i.e., requires and receives a 14-day report for a self-monitoring violation that KCIW has determined requires enforcement action), and so on.

- (a) If the IU fails to submit the required 14-day report by the due date, KCIW follows the enforcement actions outlined in Table 4 of Section 5.2 of this document.
- (b) KCIW generally initiates enforcement actions (beyond a warning letter) when self-monitoring violations are reported for the same parameter or cause in 3 out of 4 consecutive months, indicating that the IU has failed to correct the noncompliance. Variances in the 3 out of 4 months action guideline may apply based on the IU's self-monitoring and reporting frequency, enforcement considerations outlined in Section 4.2 of this document, or when the IU is making satisfactory progress on a related Compliance Order issued by King County.
- (c) KCIW determines the appropriate level of enforcement action based on the enforcement considerations outlined in Section 4.2 of this document. Enforcement action options available to KCIW are described in detail in Section 5.1 of this document.

General Processing Notes

- Days in the timeline are business days and represent processing goals. Deviations from these timelines can be expected at times for various reasons, including, but not limited to, staff availability, workload demands, and competing special projects
- During this process, the IU may request and KCIW may grant extensions, which would result in deviations from the timelines listed in Table 2.
- Maintaining verbal and written communication with the IU throughout this process is recommended to reduce the timeline and number of escalation steps necessary to obtain compliance.

Table 3. Permit and King County Code Violations – Time Period and Response

Time Period*	Action
Start	KCIW discovers and documents permit and/or King County Code violation(s) through its regular inspection program or other compliance activities. (a)
~4-6 days	Investigator notifies the industrial user of violation(s) and imminent issuance of NOV. Investigator signs and issues an NOV. (b)
~15-25 days	Investigator receives & reviews 14-day report from industrial user. (c) Investigator conducts PVIMP inspection. Specialist conducts PVIMP sampling, if appropriate. (d)
~10-20 days	Investigator receives & reviews PVIMP sample data (if a sample was collected), confirms compliance status, and determines SNC status.
~10-20 days	Investigator drafts enforcement action and begins internal review. (e)
~2-5 days	Investigator finalizes enforcement action and notifies IU.
~2-3 days	IW Program Manager signs and issues the enforcement action.
Required Action(s) due date(s)	If compliance is not achieved or IU fails to abide by terms of enforcement action, KCIW escalates the enforcement action as follows:
~2-3 days	Investigator makes inquiry on delinquent items and informs IU of pending issuance of OTAAC. Failure to appear at OTAAC results in KCIW initiating permit or discharge authorization suspension or revocation.
~5-10 days	IW Program Manager Issues OTAAC.
OTAAC date	Hold OTAAC meeting.
~5-10 days	IW Program Manager signs and issues OTAAC meeting summary letter including required compliance actions and timelines, if appropriate.
OTAAC Required Action(s) due date(s)	If compliance is not achieved or IU fails to abide by terms of OTAAC meeting, KCIW further escalates the enforcement action as follows:
~5-10 days	Investigator sends written notice informing IU of pending permit or discharge authorization suspension or revocation.
30 days after IU has been informed	IW Program Manager suspends, or WTD Director revokes, the IU's waste discharge permit or discharge authorization.

Time period represents a range of days when an action is to be completed. The time period begins when the previous action is complete. For example, the investigator completes the action in the second row (i.e., notifies the IU of violations and imminent issuance of NOV and signs and issues an NOV) within ~4-6 days from completion of the previous action (i.e., discovers permit and/or King County Code violation(s) through its regular inspection program or other compliance activities), and so on.

- (a)** Such as failure to comply with conditions and requirements specified in a KCIW control document or K.C.C. 28.84.060.
- (b)** The NOV requires that the IU submit a 14-day report providing an explanation for the violation, corrective actions taken, and results from the IU's required resample of their effluent for the violating parameter(s), if appropriate.

- (c) If the IU fails to submit the required 14-day report by the due date, KCIW follows the enforcement actions outlined in Table 4, Section 5.2, of this document.
- (d) The need to collect PVIMP sample in response to permit or King County Code violations should be evaluated on a case-by-case basis.
- (e) KCIW determines appropriate level of enforcement action based on the enforcement considerations outlined in Section 4.2 of this document. Section 5.1 of this document presents detailed descriptions of enforcement action options available to KCIW.

General Processing Notes

- Days in the timeline are business days and represent the processing goal. Deviations from these timelines can be expected at times for various reasons, including, but not limited to, staff availability, workload demands, and competing special projects.
- During this process, the IU may request and KCIW may grant extensions, which would result in deviations from the timelines listed in Table 3.
- Maintaining verbal and written communication with the IU throughout this process is recommended to reduce the timeline and number of escalation steps necessary to obtain compliance.

Table 4. Reporting Violations – Time Period and Response

Time Period*	Action		
Start	Required report is due. (a)		
~3–4 days	Investigator makes inquiry on report status.		
~4–5 days	If no report is received, the investigator prepares a Final Notice of pending penalty (Final Notice) for a reporting violation and potential SNC. (b) (c)		
~2–3 days	Investigator notifies the IU of reporting violation and imminent issuance of Final Notice. IW Program Manager signs Final Notice.		
~20–25 days (time period depends on situation & the Final Notice receipt date)	<p><u>Scenario 1</u></p> <p>The report is received on or <u>BEFORE</u> the due date established in the Final Notice: Investigator checks SNC status.</p>	<p><u>Scenario 2</u></p> <p>The report is received <u>AFTER</u> the due date established in Final Notice: IU is fined based on the terms of the Final Notice. Investigator checks on SNC status.</p>	<p><u>Scenario 3</u></p> <p>The report is <u>still NOT received</u> after issuance of the Final Notice: Investigator informs IU of penalty incurred & next steps (enforcement action) and SNC status (if applicable).</p>
~3–4 days	If in SNC, investigator drafts & IW Program Manager signs Notification of SNC status.	Investigator drafts and IW Program Manager signs Assessment of Penalty Notice and if applicable, Notification of SNC status	IW Program Manager signs Assessment of Penalty & Notification of SNC status, if applicable
Required Action due date(s)	If IU fails to submit required report (Scenario 3 above), KCIW escalates the enforcement action as follows:		
~2–3 days	Investigator makes an additional inquiry on delinquent report and informs IU of pending issuance of OTAAC. Failure to appear at OTAAC results in KCIW initiating permit or discharge authorization suspension or revocation.		
~5 to10 days	IW Program Manager Issues OTAAC		
~5 to10 days	IW Program Manager signs and issues OTAAC meeting summary letter including required compliance actions and timelines, if appropriate		
OTAAC date	Hold OTAAC meeting		
OTAAC Required Action due date	If compliance is not achieved or IU fails to abide by terms of OTAAC meeting, KCIW further escalates the enforcement action as follows:		
~5–10 days	Investigator sends written notice informing IU of pending permit or discharge authorization suspension or revocation (d)		
30 days after IU has been informed	IW Program Manager suspends, or WTD Director revokes, the industrial user’s waste discharge permit or discharge authorization		

(*) Time period represents a range of days when an action is to be completed. The time period begins when the previous action is complete. For example, the investigator completes the action in the second row (i.e., makes inquiry on report status) within ~3–4 days from completion of the previous action (i.e., report due date), and so on.

- (a) Examples of required reports include, but are not limited to, pretreatment system engineering reports, Spill/Slug Control plans, SMRs, 14-day reports, discharge permit applications, etc.
- (b) The Final Notice establishes a date by which the IU must submit the past due report to avoid a penalty and describes the penalty amounts and schedule.
- (c) SNC status determination regarding late report submittals applies to SIUs only.
- (d) In cases where the IU does not hold a KCIW permit or discharge authorization, KCIW will consult with the King County Prosecuting Attorney's Office to determine the best approach to remedy the noncompliance. An example of such a case may be where KCIW identifies an unpermitted IU and requires that a waste discharge permit application be submitted.

General Processing Notes

- Required reports that are more than 45 days late will result in the SIU being in SNC.
- The entirety of the process described above is a worst-case scenario. The process ends at any point when the required report is received
- Days in timeline are business days and represent processing goal. Deviations from these timelines can be expected at times for various reasons, including, but not limited to, staff availability, workload demands, and competing special projects.
- During this process, the IU may request and KCIW may grant extensions, which would result in deviations from the timelines listed in Table 4.

Chapter 6

Enforcement Response Plan Implementation Responsibilities

KCIW is comprised of Industrial Waste Compliance Investigators, Industrial Waste Compliance Specialists, and Industrial Waste Staff Engineers. The Industrial Waste Program Manager oversees the entire program and is delegated this responsibility by the WTD Director (see organization chart at the end of this chapter). Among other key job responsibilities, each investigator is responsible for investigating instances of noncompliance and issuing the appropriate enforcement action for their assigned facilities. The issuance of an enforcement document to an industrial user is signed by the responsible King County staff or manager. Table 5 lists the official(s) responsible for issuing each type of enforcement action response.

The following are brief descriptions of the typical roles of King County personnel involved with the Industrial Waste Program:

- WTD Director:
 - Oversees all aspects of WTD. Is delegated to implement a pretreatment program.
- Environmental and Community Services Section Manager:
 - Reviews all enforcement-related communication generated by KCIW and directed to the WTD Director for approval and signature.
- Industrial Waste Program Manager:
 - Delegated official to oversee the operation of KCIW.
 - Manages program tasks and delegates staff to fulfill the inspection and monitoring requirements of KCIW.
- Industrial Waste Staff Engineers (Lead):
 - Review documents prepared by Industrial Waste Investigators.
 - Review and approve engineering submittals per WAC 173-240.
- Industrial Waste Compliance Investigator III (Lead):
 - Reviews documents prepared by Industrial Waste Investigators I and II.
 - Reviews policy, public rules, and KCIW program elements.
 - Performs the duties of Investigators I and II.

- Industrial Waste Compliance Investigators I and II:
 - Review permit applications and industrial user surveys and issue appropriate control documents.
 - Inspect SIUs once per year and other non-SIUs as necessary. Complete inspection reports and required forms for corrective actions.
 - Track and review SMRs, require 14-day reports for violations, and provide appropriate response for violations, including NOVs, civil penalties, and compliance orders.
 - Coordinate enforcements.
 - Track and review required report submittals.
 - Respond to unusual occurrences in the treatment works and illicit discharges.
 - Respond to incidences of King County Code violations by non-permitted violators.

- Industrial Waste Compliance Specialists I, II, and III (Sampling and Monitoring Team):
 - Responsible for sampling and monitoring functions of the IW Program, including PVIMP samples.
 - Provide supporting documentation to investigators.
 - Alert investigators of violations of field samples and unapproved sampling protocols by industrial users.

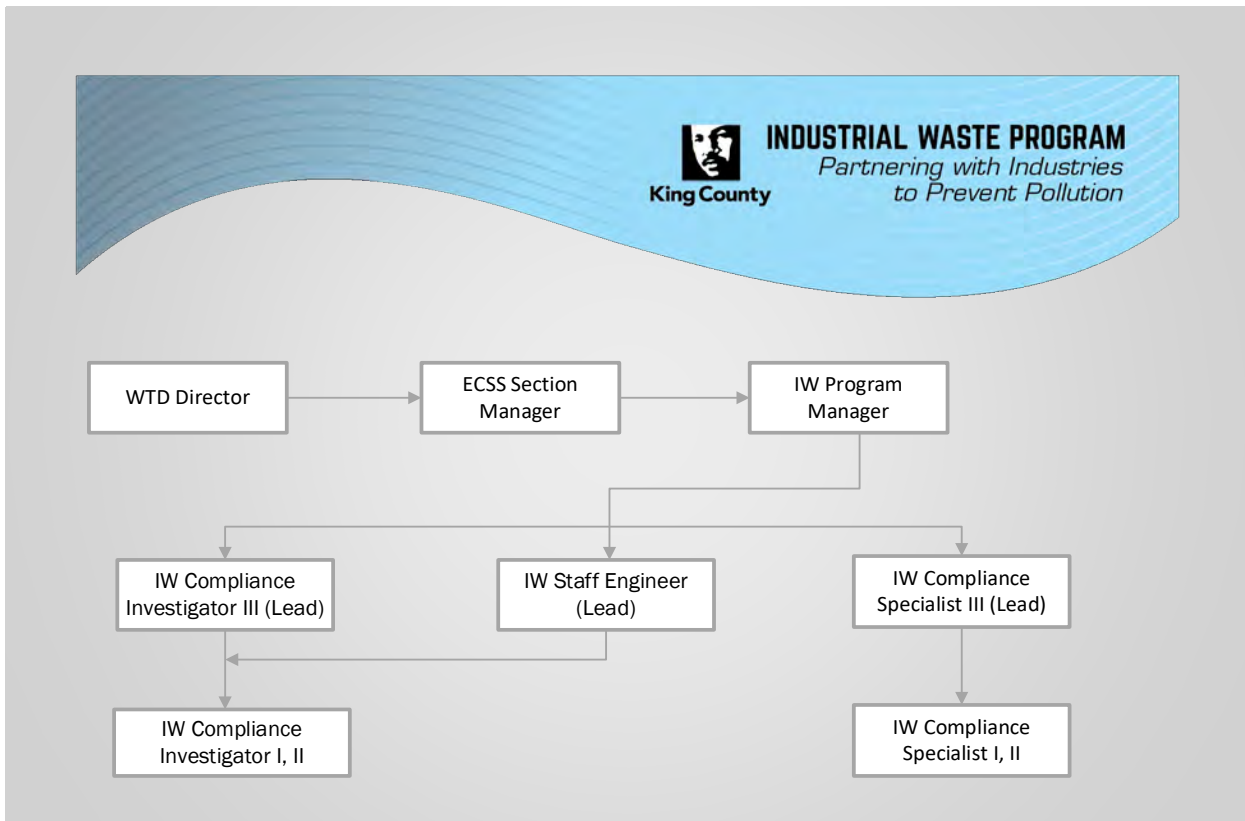


Table 5. Enforcement Actions and Responsible Officials

Enforcement Action	IW Compliance Investigator I, II	IW Compliance Investigator III (Lead) IW Staff Engineer (Lead)²	IW Program Manager³	WTD Director	KC Hearing Examiner
Enforcement Response Plan				X	
Verbal Notification	X	X			
Written Notification	X	X			
Warning Letter	X	X			
Notice of Violation	X	X			
Determination of No Further Action	X	X			
Final Notice			X		
Compliance Order			X		
Assessment of Monetary Penalties (civil)			X (<\$100,000)	X (≥\$100,000)	
Assessment of PVIMP Charges	X (DNFA only)	X (DNFA only)	X (<\$100,000)	X (≥\$100,000)	
Assessment for Damage			X (<\$100,000)	X (≥\$100,000)	
Assessment of Economic Benefit for Noncompliance			X		
Increased Self-Monitoring Requirements			X		
Public notification of violations			X		
Order to Appear at Conference			X		
Cease Discharge Notice			X		
Emergency Suspensions			X		
Revocation of Permit or Authorization and Termination of Discharge				X	
Supplemental Environmental Project				X	
Request for Reconsideration				X	
Appeal Decision					X
Refer cases to state and federal authorities for criminal enforcement				X	

² IW Compliance Investigator III and IW Staff Engineers can sign on behalf of the staff working under them as needed. They may also sign for the IW Program Manager if delegated by the IW Program Manager to do so during their absence or as directed by the ECSS Section manager or WTD Director.

³ IW Program Manager can sign any enforcement action documents that have been delegated to the staff working under them as needed.

Chapter 7

KCIW Procedures Manual

King County Industrial Waste Program's Procedures Manual has a chapter that contains detailed implementation procedures for this ERP. KCIW continually updates these written enforcement-related instructions and procedures to promote consistency among its staff in interpreting and implementing the 40 CFR Part 403 General Pretreatment Regulations; state regulations at WAC 173-216, WAC 173-208, and WAC 173-240; and the industrial waste rules and regulations codified in K.C.C. 28.84.060. KCIW updates these procedures as needed when new or evolving conditions warrant it. Updates to these procedures remain within the purview of this ERP and are not broader in scope than this ERP. If a change in procedures impacts any component of this ERP, the ERP is updated first with Ecology's approval.

References

Clean Water Act (33 U.S.C. 1251 *et seq.*)

Code of Federal Regulations Title 40, Part 403, General Pretreatment Regulations for Existing and New Sources of Pollution

Revised Code of Washington Chapter 90.48, Water Pollution Control

Washington Administrative Code 173-216, Washington State Waste Discharge Permit Program

Washington Administrative Code 173-208, Grant of Authority Sewerage Systems

Washington Administrative Code 173-240, 130 Engineering Report

King County Code 28.84.060, Industrial Waste Rules and Regulations

King County Code 28.82, Definitions

King County Code 28.84.100, Appeal Procedure

King County Industrial Waste Procedures Manual, Chapter 6, “Enforcement” Chapter