

Industrial Pretreatment Newsletter

Published for industrial dischargers by the King County Industrial Waste Program (KCIW)



King County

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

Fall 2014

Mission Statement

The mission of the Industrial Waste Program is to protect the environment, public health, biosolids quality, and King County's regional sewerage systems. We work cooperatively with our customers as we regulate industrial discharges, provide technical assistance, and monitor the regional sewerage system.

Industrial Waste Advisory Committee

Terry Beals, Sound Transit
Kevin Burrell, Environmental Coalition of South Seattle (ECOSS)
Wendee Cook, Exotic Metals Forming Co.
Ken Falcone, Cargill, Inc.
Donna Hoskins, Sanofi-Aventis U.S.
Julie Howell, Seattle Public Utilities
Bobby Johnson, Darigold, Inc. - Issaquah
Mark LaFata, Precor, Inc.
Tim Lew, Pepsi-Cola Co.
Steve Simacek, Hytek Finishes
Gail Spencer, Vigor Shipyards
Heather Trim, Futurewise
Doris Turner, Boeing Commercial Airplane Group - Renton
Chris VanHoof, City of Bellevue
Scott Woerman, Landau Associates

2013 KCIW Rewards and Recognition Program

(Awarded in 2014 and listed here throughout that year)

2013 Commitment-to-Compliance Awards:

(Awarded less than one percent of KCIW's 2013 permittees)
Safeway Inc. - Beverage Plant

2013 Gold Awards:

(Awarded to 36 percent of KCIW's 2013 permittees)
A.O. Smith Water Products Co.

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KCIW's new article: Loading Limits for Metals

The allocation of loadings is a challenging endeavor. On any given day, industrial users are discharging a fraction of what is allocated, and often a very small fraction of what is allocated at that. This needs to be balanced against exposing the wastewater treatment system to risks posed by several County wastewater discharge permits with metal loading allocations that, in a cumulative sense, exceed what the wastewater system can accommodate.

In 2010 the King County Industrial Waste Program evaluated the adequacy of the current local discharge limits for metals. This was the first evaluation of this type since the local discharge limits were first developed in 1990. The 2010 evaluation did not result in a change to the local discharge limit concentrations for metals, but the analysis did indicate a need to control the total mass of metals the County can allocate to a given industrial user.

KCIW is presenting an online article that provides background on how this allocation is applied, with an update on local discharge limits development specifically for the Brightwater service area.

To read the article and learn more about loading limits for metals, go to www.kingcounty.gov/industrialwaste, menu item "Local discharge limits."

Read about KCIW's office relocation to Pioneer Sq. area, Seattle on page 4. ➡





King County wastewater treatment plants earn national environmental awards

In 2014, King County's Wastewater Treatment Division earned awards from the National Association of Clean Water Agencies for outstanding compliance with state and federal permit requirements.



The South Treatment Plant in Renton and the West Point Treatment Plant in Seattle each received the Platinum Peak Performance Award. King County's Brightwater, Carnation and Vashon treatment plants received Gold awards. Thank you to industrial wastewater dischargers whose compliance with regulations helps enhance plant performance!

More information about the Peak Performance Awards and list of King County's prior rankings is available on the Web at www.kingcounty.gov/environment/wtd/About/System/TreatmentProcess/PeakPerformance.aspx.

KCIW's Commitment-to-Compliance award winner for 2013

The soft drink manufacturer and distributor Safeway Inc. Beverage Plant, Bellevue, won KCIW's Commitment-to-Compliance award for 2013. To achieve this, the facility won Gold awards for five consecutive years. Permitted to discharge 76,000 gallons per day, Safeway's industrial wastewater originates from the manufacturing and packaging of soft drinks and cleaning, sanitizing, rinsing of the product containers, manufacturing equipment and process areas. All industrial wastewater is collected and processed through a pH neutralization system prior to the facility discharging it to the sanitary sewer, with pH in the tank continuously recorded and monitored. Safeway's performance in complying with regulations also won a Commitment-to-Compliance award in 2000.



Congratulations Safeway Inc. Beverage Plant!

IRAC's new marijuana guidance work group

In 2014, KCIW began participating in a newly-formed recreational marijuana producer and processor guidance work group, coordinated by the Interagency Resource for Achieving Cooperation (IRAC). The purpose of this workgroup is to understand the health, safety, and environmental issues associated with this new and little known business sector in order to develop appropriate and sensible guidance for the producers, processors and the regulatory inspectors. The work group includes local and state government agencies, private companies, and the Coalition for Cannabis

(AWARDS-Continued from page 1)

- Alaskan Copper Works - 6th Ave.
- Aramark Uniform & Career Apparel LLC
- Baker Commodities Inc.
- Black Oxide LLC
- BNSF Railway Co. - Interbay Facility
- Boeing Commercial Airplane - Auburn
- Boeing Commercial Airplane - North Field
- Boeing Commercial Airplane - Renton
- Boeing Electronics Center
- BP West Coast Products LLC
- Carl Zapffe Inc.
- Ceradyne Inc. - Viox Glass Technology
- CMC Icos Biologics Inc.
- Coca-Cola Bottling Co. of Washington
- Exotic Metals Forming Co.
- Glacier Northwest Inc.
- GM Nameplate Inc.
- Honeywell International Inc.
- King County Road Services Division - Renton Decant Facility
- King County Solid Waste Division - Factoria Transfer Station
- King County Solid Waste Division - Renton Transfer Station
- King County Solid Waste Division - Shoreline Transfer Station
- King County Solid Waste Division - Vashon Transfer Station
- Marel Seattle Inc.
- Precor Inc. - Plant 1
- Precor Inc. - Plant 2
- Primus International - University Swaging Division
- Protective Coatings Inc.
- Romac Industries Inc.
- Safeway Inc. - Beverage Plant
- Sanofi-Aventis U.S. LLC
- Seattle Public Utilities - Kent Highlands Landfill
- Seattle Public Utilities - South Transfer Station
- Skills Inc. - Auburn Facility
- Terex Washington Inc. - North Campus
- Tim's Cascade Snacks
- TOC Holdings Co.
- Tri-Way Industries Inc.
- Universal Sheet Metal Inc.
- University of Washington School of Dentistry
- Vigor Shipyards Inc.
- Western Pneumatic Tube Co.
- Wash. State Dept. of Transportation - SR 520 Bridge Replacement and HOV Program Construction Site

(Continued on page 3)

2013 Silver Awards:

(Awarded to 23 percent of KCIW's 2013 permittees)

Accurate Industries
Amgen Corp. - Seattle
Art Brass Plating Inc.
ASKO Processing Inc.
B.S.B. Diversified Co. Inc.
Crane-Eldec Corp.
Darigold Inc. - Rainier Plant
Davis Wire Corp.
Esterline Hytek Finishes Co.
Kenworth Truck Co.
King County Solid Waste Division -
Bow Lake Transfer Station
King's Command Foods Inc.
National Products Inc.
Pepsi Beverages Co. - Seattle
Facility
Pioneer Industries
Port of Seattle, Sea-Tac
International Airport, BW
Port of Seattle, Sea-Tac
International Airport, IWS
Prototron Circuits Inc.
Qualawash Holdings LLC
Rabanco Recycling Co.
Ralcorp Frozen Bakery Products
Red Dot Corp.
Redhook Brewing Co.
Shasta Beverages
Sound Transit - University of
Washington Station Location
Terex Washington Inc. - South
Campus
Vectra Fitness Inc.
Wash. State Dept. of
Transportation - Alaskan Way
Viaduct Replacement Project,
SR 99 Bored Tunnel

KCIW Updates



(Continued from page 2)

Standards and Ethics Trade, a non-profit trade organization representing the cannabis industry. Work group products include a regulatory guidance document (currently in production), training for inspectors, and outreach to the businesses. The IRAC workgroup plans to meet with marijuana producers and processors in fall 2014 and provide training for inspectors in winter 2014 - 2015.



For more information about KCIW's participation in the work group contact the KCIW office. (See contacts, below.)

Revised Industrial Stormwater General Permit

The Washington State Department of Ecology (Ecology) is revising and reissuing the Industrial Stormwater General Permit. The public comment period closed July 11. Current permit holders were required to re-apply for permit coverage by July 1. Ecology plans to issue the new, final ISGP on Nov. 19, with an effective date of Jan. 1, 2015.

For more information go to www.ecy.wa.gov/programs/wq/Stormwater/industrial/index.html, or contact Jeff Killelea at 360-407-6127, email jeff.killelea@ecy.wa.gov.

Seattle stormwater code and rules update-draft Stormwater Manual

The City of Seattle is revising its existing Stormwater Code and the associated Director's Rules. Upcoming opportunities to comment include: during the SEPA review process, anticipated for fall 2014; during the legislative process and formal public review period, anticipated for winter 2015 and at a City Council public hearing, anticipated for 2015. *To learn more go to: www.seattle.gov/dpd/codesrules/changestocode/stormwatercode/whatwhy.*

About the Industrial Pretreatment Newsletter

Published by the Industrial Waste Program, Wastewater Treatment Division, King County Department of Natural Resources and Parks (DNRP)

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Read KCIW newsletters and about KCIW at: www.kingcounty.gov/IndustrialWaste

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Ph: 206-477-5300 or TTY: 711. Email: info.kciw@kingcounty.gov

This material is provided in alternative formats upon request by calling 206-477-5300 or TTY relay: 711

The KCIW office is moving!



This November the KCIW office is relocating from Seattle's Fremont neighborhood to a King County office building in the Pioneer Square area of Seattle. Since it is important for industrial users of the sewer system to be in touch with the program and submit reports and other information on-time, KCIW has provided several announcements including mailing a notice about the move, and resulting address changes, to those with discharge approvals.

Basics about the relocation are supplied below and on the program's website.

KCIW relocation basics

➤ When is the KCIW office relocating?

- November 2014

➤ What's changing?

- Physical location of KCIW office
- KCIW's mailing address
- Phone numbers

➤ KCIW main phone number:

Main office number is now 206-477-5300 or TTY: 711.

Will calls to the former office phone numbers be redirected?

Only calls to our former main office phone number, 206-263-3000, will be redirected for a limited time.

➤ All KCIW employees' office phone numbers will change.

➤ Where will the new KCIW office be?

201 S. Jackson St., 5th floor
Seattle

New mailing address of the KCIW office:

201 S. Jackson St., Room 513
Seattle, WA 98104-3855

Will mail sent to the former office be redirected?

Yes, when we relocate our office, mail sent to our former address will be redirected to our new address for a limited time.

What is not changing?

➤ KCIW office fax number is NOT changing: it will continue to be 206-263-3001

➤ KCIW employees: KCIW employees will remain the same. The routine assignment of compliance investigators to discharge approvals will not be affected by the move

➤ KCIW employees' cell phone numbers will remain the same

➤ Email addresses: KCIW employee email addresses will remain the same, as will the program's main email address: *info.KCIW@kingcounty.gov*

➤ Employee contact information: There is a link on KCIW's web page to all KCIW employees' current contact information

➤ KCIW's work with you: KCIW operations and procedures will remain the same

➤ KCIW's website is not changing, remaining as a resource, and its Web address **www.kingcounty.gov industrialwaste** is not changing



TIPS: Submitting KCIW self-monitoring reports



Visiting KCIW at its new location

- KCIW's customers are always welcome to visit the office. While KCIW conducts most activities with its customers by phone, with email and during periodic visits to their facilities, customers can and do visit our offices
- Visitors are encouraged to plan visits ahead
- Directions to our new Pioneer Sq. office, including parking and transportation options, are available on KCIW's web pages and by contacting our office
- KCIW's visitors' parking in the office's building parking lot will be validated

How has KCIW communicated this change with those industrial users of the county sewer system?

- **KCIW announcements:**
 - Three KCIW newsletters in 2014
 - On KCIW Web pages
 - Notice mailed about the move to industrial users of the sewer system
 - Voicemail announcement on KCIW phones (both old phone numbers and new numbers)
 - New address is on all KCIW employees' email signature lines
- **KCIW document and publications:**
 - The program will update contact information on documents and publications

Your questions about our relocation process are important to us, and your suggestions and comments are welcome and encouraged. Be in touch!

Email: info.KCIW@kingcounty.gov

Call: 206-477-5300 or TTY:711

Competent and timely monitoring and sampling of industrial discharges are part of the foundation of KCIW's pretreatment program, providing accurate, defensible data on industrial discharges to the County's sewer system. Industrial users submit the data they collect based on a prescribed schedule contained in each facility's KCIW discharge approval document. What facilities must report varies, based on the sampling parameter schedules for each facility that has an industrial wastewater discharge approval that specifies sampling.

Pretreatment regulations require that facilities get reports in on time. A common factor for all self-monitoring reports is that they are due on the 15th of the month, whether they are to be submitted monthly, quarterly, semiannually, or annually.

Self-monitoring report submittal methods and tips:

Each self-monitoring report needs only to be submitted once, so choose one of the following ways:

1. Submittal via email attachment (preferred way to submit) sent to info.KCIW@kingcounty.gov:
 - Facilities must send a scanned, signed self-monitoring report.

Please do not submit self-monitoring reports directly to the assigned compliance investigator's email account. This may cause delays in KCIW receiving the reports.
2. Submit by regular U.S. mail.
 - Care must be taken to allow for delivery of U.S. mail by the date the report is due.

3. Submit by fax to 206-263-3001

All reports that facilities submit must be signed by an authorized representative of the facility.

When facilities send a given self-monitoring report in multiple ways, handling the additional copies can reduce KCIW's efficiency.



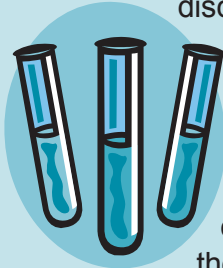
Regulatory update: New EPA Sufficiently Sensitive Test Methods Rule

The U.S. Environmental Protection Agency (EPA) has published the Sufficiently Sensitive Test Methods Rule, in effect Sept. 18, 2014.

The EPA's rule requires those with direct discharges and National Pollutant Discharge Elimination System permits to use a sufficiently sensitive method for the analysis of chemical pollutants to evaluate compliance with regulations.

This rule is being added to existing regulations that require the use of an EPA-approved method for the analysis of chemical pollutants.

The rule does not apply directly to industrial facilities that discharge into a publically owned treatment works, such as those with authorizations to discharge industrial waste to King County. However, industrial facilities with discharge approvals are still required to use, under CFR 40 part 136, both an EPA-approved method and one with a low enough method



detection limit to determine compliance with discharge limits. In general, a method with a detection limit 10 times lower than the discharge limit is considered sufficiently sensitive. For example, if a limit for copper is 3 mg /L, the analytical method selected should have a detection limit of 0.3 mg/L or lower. While authorized dischargers to the County sewer system are not required to, they may select for their own reasons the most sensitive analytical method available.

KCIW plans to provide more guidance to dischargers in coming months regarding reporting requirements for analytical methods and detection limits to ensure compliance data reported to the program meets appropriate standards.

For more information facilities should contact their assigned KCIW compliance investigators or contact the program (see page 3).

Recent enforcement actions

King County's Industrial Waste Program (KCIW) is responsible for making sure that water used by county industries returns to our waterways clean and safe. This protects our water resources, our public health, the workers at our treatment plants and the biosolids produced there. Most businesses in King County do an excellent job of meeting this clean water goal by treating their industrial wastewater before they discharge it to the sewer. Whenever possible, we work to provide technical assistance and help industries reach compliance before enforcement actions become necessary. If companies violate clean water standards, however, we do take enforcement actions, as county, state and federal regulations require.

The following companies are users of the County sewer system that violated pretreatment requirements in 2013-2014, or have not had their violations previously posted.

We all need to work together to prevent pollution. Contact KCIW if you have information for the program. (See page 3.)

The following facilities violated wastewater treatment requirements in 2013-2014 and are subject to publication because they were in significant non-compliance of pretreatment regulations and /or received fines.

The following facility sends its wastewater to King County's South Treatment Plant

Affordable Auto Wrecking, Seattle

Nature of Violation/Type of Pollutant:	Basis for Publication:	Comment:
Reporting violation: For failure to file required report.	Facility had a violation that warranted a fine.	Facility failed to file report required in special conditions of discharge authorization.

Penalty: \$500 fine.

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The following facilities send their wastewater to King County's West Point Treatment Plant

Encore Oils LLC, Seattle

Nature of Violation/Type of Pollutant:	Basis for Publication:	Comment:
Discharge violation: issued for oil and grease, volumetric and low pH - NOV issued for high pH PVIMP sample - second NOV issued for high pH PVIMP sample.	Facility had three violations that warranted a monetary penalty.	Facility was issued a final notice, fined, and issued a compliance order.

Penalty: \$750 fine and post-violation charge of \$8,600.

Industrial Container Services LLC, Seattle

Nature of Violation/Type of Pollutant:	Basis for Publication:	Comment:
Permit violation for: 1) failure to notify KCIW of use of iron phosphate in industrial process, which is not approved in the permit; 2) installation of prohibited "emergency" wastewater treatment system bypass; and 3) failure to notify KCIW of accurate square footage of area conveying contaminated stormwater to treatment system.	Facility had a violation that warranted a monetary penalty.	KCIW was fined and issued a compliance order.

Penalty: Fine of \$6,625 with a post-violation charge of \$4,840.

Seattle Barrel Co., Seattle

Nature of Violation/Type of Pollutant:	Basis for Publication:	Comment:
Discharge violations and permit violations issued for: high pH discharges (11 counts), discharges of concentrated waste (8 counts), failure to notify KCIW of discharge of listed or characteristic RCRA hazardous waste (8 counts), and failure to notify KCIW of slug discharges (9 counts).	Facility had violations that warranted a monetary penalty.	Facility was fined, and issued a compliance order. Final decision was issued with a revised fine and a supplemental environmental project.

Penalty: \$17,225 fine; supplemental environmental project \$38,025, and a post-violation charge of \$11,690.

Tank Wise LLC, Seattle

Nature of Violation/Type of Pollutant:	Basis for Publication:	Comment:
King County Code Violation: issued for, 1.) failure to secure written discharge authorization for the discharge of industrial wastes, 2.) discharging material that caused a partial sewer line obstruction or capable of contributing to explosion or supporting combustion, and 3.) failure to eliminate a direct connection that allowed the discharge of prohibited or restricted substances.	Facility had a violation that warranted a monetary penalty.	Facility completed report. Facility was fined and issued a compliance order.

Penalty: \$13,360 and a post-violation charge of \$4,840.

KCIW also acted on other enforcement actions not requiring publication in the newspaper:

Discharge violations: for copper, FOG, n-hexane extractable material, lead, pH, and zinc.

Resulting in: determinations of no further action, compliance orders, and post-violation charges of \$10,630.

Permit violations: including for failure to manually check pH at least four times per hour during failure of automatic pH recording system and discharge with no record during this time; for bypassing wastewater treatment system; for failure to notify KCIW of move to new facility and provide a closure plan for old facility.

Resulting in: Report received; determinations of no further action.

Reporting violations: for failure to file reports, for failure to file permit application, and for failure to file additional permit application information.

Resulting in: Reports received; determinations of no further action. Post-violation charges of \$2500.



King County

Department of Natural Resources and Parks

Industrial Waste Program

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RETURN SERVICE REQUESTED

**Read about KCIW's
office relocation to
the Pioneer Sq. area,
Seattle on page 4.**



Creating Resources from Wastewater