

# **City of Yakima**

# **Annual Pretreatment Report**

# 2008

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## EXHIBITS

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## A. Introduction

The City of Yakima's (City) National Pollutant Discharge Elimination (NPDES) Permit No. WA-002402-3 as issued by the Department of Ecology (Ecology), states as a condition of the permit under § S6.A.4, that the City shall provide Ecology with an annual pretreatment report of its fully delegated Pretreatment Program (to be submitted no later than April 15<sup>th</sup> of each year) to briefly describe its program activities during the previous calendar year.

The City enforces Federal, State and local limits on discharges to the publicly owned treatment works (POTW) through the fully delegated Pretreatment Program, the more stringent being defined as Pretreatment Standards under § 307 (d) of the Clean Water Act. The City performs inspections and monitoring activities on twenty-seven (27) significant industrial users (SIUs) and over 460 minor industrial users (MIUs). A thorough inspection and monitoring of each SIU shall be conducted at least annually.

## **B.** Sewer Use Ordinance and Special Agreement Changes.

Amendments to the Yakima Municipal Code relating to wastewater rates, fees and charges.

 In January of 2008, the City approved amendments to the Yakima Municipal Code relating to wastewater rates, fees and charges. These changes include a surcharge of \$0.276 per pound of fat, oil and grease (FOG) assessed to those businesses that discharge FOG above the local limit of 100 mg/L. Violators of this limit may also incur enforcement action leading to possible administrative penalties in accordance with § 7.65.200 of the City of Yakima's Municipal Code (YMC).

Special Agreement between the City of Yakima and Terrace Heights Sewer District.

- A Special Agreement was entered into between the City of Yakima, the Terrace Heights Sewer District and the City of Moxee to accommodate effluent discharges from Moxee to Terrace Heights Sewer District and ultimately into the City of Yakima POTW. The completion date for the Moxee sewer-line construction was July, 2008.
- Revisions to Yakima County, City of Union Gap, Terrace Heights Sewer District and City of Moxee sewer use ordinances to incorporate Pretreatment Streamlining provisions, as outlined in the General Pretreatment Regulations (40 CFR Part 403), were finalized in 2008.

## C. Local Limits

There were no changes to the City's local limits in 2008. The City is currently reviewing outside vendors to reevaluate the City's local limits. The City's local limit reevaluation is to

be completed by July 2010 for incorporation into the City's Wastewater Treatment Plant's next NPDES Permit cycle beginning June 30, 2011.

## D. Staffing and Funding of the Pretreatment Program

A 2008 Cost of Service Study was developed to identify expenses associated with the City's Pretreatment Program. The need for assistance in writing and issuing wastewater discharge permits was identified.

Funding for an "Environmental Compliance Specialist", first identified in Yakima's 2004 Facility Plan, was approved by City Council in April of 2008 and the position was filled in August, 2008. The basis for funding a new position is to provide assistance in writing and issuing wastewater discharge permits for industries. In addition, the Environmental Compliance Specialist reviews data and other pertinent permit requirements to ensure compliance and make recommendations for appropriate types of enforcement actions when needed. The Environmental Compliance Specialist also reviews the City's NPDES permit to ensure compliance with the Department of Ecology, the Clean Water Act, Emergency Planning and Community Right-to-Know Act, as well as other regulations from agencies such as OSHA and WISHA. The Environmental Compliance Specialist is also responsible for assisting in updating Wastewater's safety manual, O&M Manual, Spill Prevention Plan, preparing grant proposals and other related documents.

The current Pretreatment staffing levels are:

Job Title	Number of Full Time Equivalents
Pretreatment Supervisor (former title - Environmental A	nalvst) 1
Environmental Compliance Specialist	1
Pretreatment Crew Leader	2
Pretreatment Technician	3

## E. Industrial (IW) Surveys

In accordance with 40 CFR 403.8 (f)(2)(i), the City of Yakima is identifying and locating all possible industrial users which might be subject to the Pretreatment Program. Preliminary industrial waste (IW) surveys are submitted to each business with their business license in the Codes Department. Business owners can also obtain IW Surveys by going to the City's website. Upon receipt of the completed IW survey in the pretreatment office, the business is added onto a spreadsheet and tracked. An initial review of the IW survey is made to determine whether this business is of "concern" to the City's POTW. If the IW survey is designated as a "no concern" the survey is filed with no further follow-up. When an initial review reveals the business or industry to possibly be an SIU or MIU, pretreatment submits "Follow-Up" IW surveys to the businesses in question. The "Follow-Up" IW survey is more in depth and thorough about chemical usage and discharge characteristics. An inspection and possible testing are used to determine whether to add the possible industrial user to the Pretreatment Program.

"Preliminary" IW survey forms were revised in 2008. A revised "Preliminary" survey and Follow-up IW survey have been enclosed with this pretreatment report as *Exhibit A*.

## F. Notification of Promulgated Pretreatment Standards and/or Local Standards

SIUs are notified of any changes to the Pretreatment Standards or local limits by written notification, telephone, and during inspections.

MIUs are notified of our local limits through written notification, telephone, and during inspections.

## G. Updated Non-domestic Inventory

#### Significant Industrial Users (SIUs)

The City of Yakima considers the following types of businesses in our service area to be SIUs because of one or more of the following criteria:

- 1. Is subject to Federal categorical pretreatment standards; or
- Discharges an average of twenty-five thousand gallons per day or more of process wastewater to the POTW (excluding domestic wastewater and noncontact cooling water); or
- Contributes a process wastestream which makes up five percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or
- 4. Is designated as such by the City on the basis that it has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement.

#### Minor Industrial Users (MIUs)

The City of Yakima considers the following types of businesses in our service area to be MIUs because of one or more of the following criteria;

- 1. Discharges wastewater which meets at least one of the following criteria:
  - a. Daily average process wastewater flows exceed five thousand gallons per day, but not more than twenty-five thousand gallons per day (excluding domestic wastewater and non contact cooling water); or
  - b. Maximum daily discharge volume which exceeds one percent of the average dry weather hydraulic or organic capacity of the POTW; or
- 2. Is otherwise deemed by the City to be categorized as a MIU.

An updated non-domestic inventory that includes both SIUs and MIUs has been enclosed as *Exhibit B*. The SIU list also indicates when the City of Yakima inspected each facility in 2008.

Please note: Jewel Apple, Ltd., was permitted in July, 2008. Pretreatment toured and performed preliminary inspections of the facility on a number of occasions to examine pretreatment modifications; however, an official compliance inspection with report was not performed until January, 2009. The City allowed Jewel Apple time to combine process lines, install a discharge meter and a filtration system. A letter requesting the postponement of the official compliance inspection was submitted and approved by Ecology in December, 2008.

## H. Authorization to Discharge

Authorization to Discharge Temporary Permits

Temporary discharges, such as groundwater clean-up, require an "Authorization to Discharge".

The City did not issue any temporary wastewater discharge permits during 2008.

## I. Industrial Wastewater Discharge Permits

The City is responsible for issuing each SIU with a wastewater discharge permit. Permits issued by Ecology and delegated to the City of Yakima will be re-written and issued to the SIU by the City. Industrial wastewater discharge permits are issued for a specified time period of up to five (5) years. Wastewater discharge permits, however, may be extended at the discretion of the Wastewater Manager. Two Industrial Wastewater Discharge Permits were issued in 2008. Several permits are scheduled to be completed and issued in early 2009.

• JELD-WEN, Inc., 1123 N. 6<sup>th</sup> Avenue. Permit #CY-JW-10 became effective on February 26, 2008 and expired on \*February 25, 2009. JELD-WEN molds and forms polyvinyl chloride and is subjected to Federal wastewater discharge standards contained in the Plastic Molding and Forming Category A 40 CFR 463.16 under Subpart A., Contact Cooling and Heating Subcategory, Pretreatment Standards of New Sources. Based on federal standards and the potential to upset the City's POTW, the City classifies Jewel Apple as a significant industrial user (SIU).

\*Note: A five year permit was issued on February 26, 2009 and is effective until February 25, 2014.

• Jewel Apple, Ltd., 703 N. 1<sup>st</sup> Avenue. Permit #CY-JA-11 became effective on July 14, 2008. Jewel Apple is a sliced apple processing and packing facility. Jewel Apple is subjected to federal wastewater discharge standards contained in the General Pretreatment Regulations 40 CFR 403, Pretreatment Standards for

Existing and New Sources of Pollution. Based on federal standards and the potential to upset the City's POTW, the City classifies Jewel Apple as a significant industrial user (SIU).

## J. Compliance Inspections

The City of Yakima conducted a compliance inspection on each SIU, with the exception of newly permitted Jewel Apple, at least once during 2008 in accordance with 40 CFR 403.8(f)(2)(v). A copy of the Compliance Inspection Reports was sent to each of the SIUs.

## K. SIU Sampling and Results

SIU sampling results for 2008 have been enclosed as Exhibit C.

The City of Yakima sampled each SIU at least once during 2008 in accordance with 40 CFR 403.8(f)(2)(v) when self-monitoring was conducted by the SIU. If self-monitoring was not conducted by the SIU, the City of Yakima sampled the SIU at least twice in accordance with § S6. A. g. of the City's NPDES Permit.

The following SIUs have current wastewater discharge permits with the City; however, there were no discharges to the City's POTW in 2008. Therefore, no sampling results are available for Voelker Fruit and Dunollie Enterprises.

- Voelker Fruit, 15 W. Mead Avenue, informed the City that apple processing and packing would not occur at the facility during the 2008 apple season.
   Pretreatment crews monitored the facility during this period and indicated that the gates were locked and there was no activity during the fall of 2008. The facility was inspected by Pretreatment personnel on September 3, 2008.
   Processing was not taking place at the facility; therefore, no samples were collected during 2008.
- Dunollie Enterprises, 805 N. 7<sup>th</sup> Avenue informed the City that plywood manufacturing would not occur at the facility. The only operation still running at the plant is the de-barker and chipper process for the Shawn Montee Log Yard. The facility was inspected by Pretreatment personnel on August 27, 2008. Pretreatment personnel observed no activity at the plywood facility and indicated that the remaining equipment is being parted or sold.

## L. MIU Sampling and Results

The Pretreatment Program classifies 463 businesses as MIUs, 376 were inspected and/or sampled in 2008. The remaining MIUs are scheduled for inspection and sampling in the first part of 2009.

Results of MIU sampling for 2008 have been enclosed in *Exhibit D*.

## M. Terrace Heights Sewer District Sampling Results

The Pretreatment Program performs monthly sampling for BOD, TSS, pH, and FOG, and quarterly sampling for metals at the Terrace Heights Sewer Distinct sampling port located at the Yakima WWTP.

Results of Terrace Heights Sewer District sampling have been enclosed in Exhibit E.

## N. City of Union Gap Sampling Results

The Pretreatment Program performs monthly sampling for BOD, TSS, pH, and FOG, and quarterly sampling for metals at Union Gap's master lift station.

Results of Union Gap sampling have been enclosed in Exhibit F.

## O. Wastewater Sampling at the Treatment Plant

Special Condition S4.B. of the City of Yakima's NPDES Permit, specifies that the City submit results of wastewater sampling as specified in Special Condition S6.B. at the treatment plant.

Priority Pollutants - Metals, phenols, cyanide, VOCs, Semi-VOCs and Pest/PCBs.

- 1. Influent
- 2. Effluent
- 3. Biosolids
- 4. Metals and organic priority pollutant removal rates

#### WET Tests

The City is required to perform both acute and chronic whole effluent toxicity (WET) tests on its effluent using *Ceriodaphnia dubia* in accordance with § S.9. and S.10. of the City's NPDES Permit (WA-002402-3)

Acute WET testing was conducted twice per month during the months of August, September and October as specified under the City's current NPDES permit. Laboratory results indicated that there was no significant difference in survival between the control and acute critical effluent concentration of 53.8% effluent, which had 100% survival in the Acute WET testing performed during the months of August, September and October.

Chronic toxicity testing was conducted in June, which fulfilled the Spring/Summer testing requirement and again in October, which fulfilled the Summer/Fall testing requirement for the City's current NPDES permit.

• The Spring/Summer chronic WET test (initiated in June) demonstrated 100% survival and reproduction in the 100% effluent sample. Therefore, no effect was

detected in the acute or chronic critical effluent concentrations of 53.8 and 9.88% sample respectively.

• The City's 2008 Summer/Fall chronic WET test was initiated in October. The highest concentration with no observed effect was 100% effluent for survival and 53.8% percent for reproduction. No effect was detected in the acute or chronic critical effluent concentrations of 53.8 and 9.88% sample respectively.

A Toxicity Identification/Reduction Evaluation (TI/RE) plan, which is required by the City's NPDES permit in response to significant effects in 2007 chronic toxicity tests, was submitted to the Department of Ecology on February 5, 2008. The TI/RE plan included results from chronic WET testing conducted during the 2007 Summer/Fall biomonitoring period as well as a summary of previous significant responses for WET testing since 1997. The report also outlined a TI/RE plan based on results from toxicity testing in conjunction with a review of plant operations and outlines additional steps for evaluating plant effluent during the 2008 Summer/Fall biomonitoring period.

The approach outlined in the TI/RE plan is a proactive response by the City to sporadically occurring toxicity in their chronic WET tests. Throughout Washington toxicity has historically occurred in the early Summer/late Fall time period and has been transitory in nature. The City, therefore, conducted preliminary Toxicity Identification Evaluation (TIE) testing concurrent with the Summer/Fall WET test beginning in 2008 and proposed to immediately continue with more definitive TIE testing if the sample demonstrated toxicity at concentrations below the CCEC. In addition, the City continues to inspect and monitor all fruit packers and industrial users as well as continues to review Industrial Waste Surveys submitted by all new businesses to determine if discharges to the plant have or will have the potential to cause toxicity at the plant.

A Phase I Toxicity Identification Evaluation (TIE) using the test species *Ceriodaphnia dubia* was conducted with the effluent samples collected in October 2008. Baseline testing did not exceed NPDES toxicity limits, however, TIE test results indicated that nonpolar organic compounds may have caused some toxicity, but it could not be ruled out that microbes may have also contributed to some of the observed toxicity. Follow-up steps were recommended; however, the laboratory did not immediately initiate Phase II TIE testing and could not guarantee that the toxicity had not changed during storage.

In a letter submitted to the Department of Ecology (Ecology) on January 20, 2009, the City requested that Phase II TIE testing not be performed until the Summer/Fall 2009 Chronic WET test is conducted. Ecology concurred with the City's request to forgo Phase II TIE testing until the Summer/Fall of 2009.

Results of 2008 priority pollutant testing for City of Yakima wastewater treatment plant influent, effluent, and biosolids, metal and organic priority pollutant removal rates, WET testing results, Phase I TIE test results and the City's request to revise the TI/RE plan as well as Ecology's response to the request have been included have been as *Exhibit G.* Please note: Laboratory chain of custodies, case narratives and quality control results are available upon request, however, these laboratory result attachments have not been included with the 2008 City of Yakima Pretreatment Report.

## P. Pass Through and Upsets

There was no pass-through at the City's Wastewater Treatment Plant during 2008 that were directly attributable to wastes from industrial users.

One upset in the City's collection system occurred in 2008 that were attributed to wastes from two industrial users.

 On October 24, 2008, Wastewater Collection personnel were notified of a sewer back-up at 101 N. 3<sup>rd</sup> Avenue. Closed circuit TV evidence, dye testing and facility inspections indicated that resin and hot water discharged from Hops Extract, 305 N. 2<sup>nd</sup> Ave., commingled with a discharge of glue from Michelsen's Packaging, 202 B, 2<sup>nd</sup> Ave. It was determined that a combination of resin, hot water, and glue caused the sewer back-up.

## **Q. Effluent Violations**

There were no effluent violations in 2008 that were directly attributed to industrial users.

## **R. Violations and Enforcement Actions**

## Warning Letters

Warning letters were sent to the following facilities for the listed violations. A written response or telephone call was required by each facility to indicate corrective actions to be taken to reach compliance with the City of Yakima's SEWER USE AND PRETREATMENT ORDINANCE.

#### Fat, Oil and Grease

• Warning letters were sent to the following facilities for the discharge of fat, oil and grease in excess of the local limit of 100 mg/L.

BUSINESS NAME	ADDRESS	SAMPLE DATE	FOG mg/L (LIMIT 100 mg/L)	SGT HEM (LIMIT 100 mg/L)	COMMENTS
Cintas		3/27/2008	194	154	AO with \$250 Admin. Penalty plus surcharge from 5/29 -
		5/29/2008	276	90	
		7/1/2008	10,350	4,680	7/3/2008.

#### **SIU FOG Violations**

BUSINESS NAME	ADDRESS	SAMPLE DATE	FOG mg/L (LIMIT 100 mg/L)	COMMENTS
Golden Wheel	9 S. 1st St.	1/17/08	194	Warning letter 2/7/08.
Taco Bell	2124 S. 1st St.	1/20/08	218	Notified Taco Bell 1/31/08.
Taco Dell	2124 5. 151 51.	4/10/08	190	Notified Taco Bell 5/8/08.
Taco Bell	1602 W. Nob Hill Blvd.	4/17/08	3,631	Warning letter 5/8/08.
Taco Bell		9/2/08	694	Final warning letter 10/9/08.
Taco Bell	4002 Fruitvale	8/27/08	3,090	Warning letter 10/9/08.
7-11	810 E. Yakima Ave.	2/21/08	292	Warning letter 3/6/08.
Domino's Pizza	6 S. Union Ave.	2/21/08	292	Warning letter 3/6/08.
	418 W. Walnut Ave.	3/20/08	204	NOV issued 4/16/08.
El Mirador		8/12/08	174	Final NOV 10/1/08.
	2300 W. Washington	4/21/08	565	Warning letter sent 05
Barnstormers		7/10/08	287	Second warning letter 7/24/08.
		10/28/08	295	NOV issued 11/20/08
Union Gospel Mission	1304 N. 1st St.	7/9/08	229	Warning letter 7/24/08.
El Porton De Pepe'	15 S. 5th Ave.	8/12/08	400	Warning letter 9/15/08.
KFC / 5th Ave.	107 S. 5th Ave.	8/12/08	228	Warning letter 9/15/08.
McDonald's	3907 River Road	8/14/08	296	Administrative Compliance Order 10/14/08.
Golden Coin	1606 W. Nob Hill Blvd.	8/14/08	178	Warning letter 9/15/08.
Shari's Restaurant	1401 Lakeside Court	9/2/08	182	Warning letter 9/15/08.
Power House Grill	3807 River Rd.	9/16/08	265	Warning letter 10/9/08.
Cascadia, LLC	1509 S. 22nd St.	12/4/08	374	Warning letter 12/11/08.
McDonald's	1601 W. Lincoln	12/17/08	1,783	Warning letter 1/6/09.

#### **MIU FOG Violations**

The aforementioned facilities have either complied with City of Yakima FOG limits or are currently working with the City to reach compliance.

### <u>рН</u>

• Warning letters were sent to the following facilities for discharging wastewater above or below the local pH limit 5.5-12.0.

BUSINESS NAME	ADDRESS	SAMPLE DATE	pH (Limit 5.5 - 12.0)	Comments
Chief Orchards	5201 W. Chestnut Ave.	7/17/2008	5.31	pH warning letter issued 7/24/08.
Del Monte	108 W. Walnut	10/10/2008	4.72	all warries letter issued 40/02/00
Foods		10/12/2008	12.67	pH warning letter issued 10/23/08
Hops Extract	305 N. 2nd Ave.	5/7/2008	4.94	pH warning letter issued 5/7/08
Jewel Apple	703 N. 1st Ave.	7/30/2008	3.45	Final NOV issued 8/26/08.
		8/20/2008	3.73	Final NOV Issued 8/26/08.
		11/4/2008	4.97 (North) 3.85 (South)	Administrative Order with penalty issued 11/4/08.

#### SIU pH VIOLATIONS

Noel Canning	1011 S. 3rd St.	4/23/2008	5.20	Verbal Notification. Noel Canning was under compliance schedule to install an Equalization Tank.
John I Haas	1112 N. 16th	1/9/2008	12.67	Verbal Notification 1/9/08.
John I Haas	Ave.	1/10/2008	5.10	Warning letter issued 1/17/08.
Seneca Foods	2418 River Road	11/4/2008	4.59	NOV issued 11/20/08.
	401 N. 1st Ave.	4/22/2008	4.62	
		5/20/2008	5.10	Issued warning letter 5/26/08. Washington Fruit installed an injector system (7/10/08) to the
Washington Fruit		5/28/2008	12.35	wastestream to provide continuous monitoring
		6/3/2008	3.92	and pH adjustment. There were no pH violations since the installation of the injection system.
		6/26/2008	2.90	

The aforementioned facilities have either complied with City of Yakima pH local limits or are currently working with the City to reach compliance.

#### Data Monitoring Report (DMR)

• A warning letter was sent to the following facility for late submittal of the quarterly DMRs.

DMR Violations						
BUSINESS NAME	ADDRESS	SAMPLE DATE	Comments			
Chief Orchards	5201 W. Chestnut Ave.	3rd quarter 2008	Warning letter issued 10/28/08.			
Cintas	918 N. 5th Ave.	3rd quarter 2008	Warning letter issued 10/28/08.			

The aforementioned facilities have complied with City of Yakima DMR submittal requirements.

## **Notice of Violations**

Notice of Violations (NOV) were sent to the following facilities:

Business/Industry	Address	Comments
Fiesta Foods 1008 E. Nob Hill Blvd.		Issued a NOV on 2/13/08 for discharging a slugload of material into the City's wastewater collection system. The City continues to monitor this system.
Cintas 918 N.5th Ave.		Issued an Administrative Order with Administrative Penalty for FOG non- compliance. The violation was corrected as of 9/08.
		Issued a NOV on 4/16/08 for FOG non-compliance.
El Mirador	418 W. Walnut Ave.	Issued a Final NOV on 10/1/08 for FOG non-compliance. The violation was corrected as of 10/28/08.
McDonald's	3907 River Road	Issued an Administrative Compliance Order 10/14/08 with Administrative Penalty for FOG non-compliance. McDonald's is working with the City to correct this violation.
	703 N. 1st Ave.	Final NOV issued 8/26/08.
Jewel Apple		Issued an Administrative Order with Administrative Penalty for pH non-compliance on 11/4/08.
Michelsen Packaging Company	202 N. 2nd Ave.	Issued a NOV on 11/20/08 for discharging prohibited material causing a sewer back-up at 101 N. 3rd Ave. Michelsen's was invoiced labor and expenses incurred due to this incident. The violation was corrected as of 11/2008.

Hops Extract	305 N. 2nd Ave.	NOV issued on 11/20/08 for discharging prohibited material causing a sewer back-up at101 N. 3rd Ave. Hops Extract was invoiced labor and expenses incurred due to this incident. The violation was corrected as of 11/2008.
Barnstormers	2300 W. Washington	Issued a NOV on 11/20/08 for FOG non-compliance. Barnstormers has since filed for bankruptcy.
Seneca Foods	2418 River Road	Issued a NOV for pH non-compliance on 11/20/08, The violation was corrected as of 11/24/08.

In accordance with 40 CFR Part 25 and 40 CFR Part 403.8 (f)(2)(vii), the City of Yakima's Pretreatment Program provided public notice of the aforementioned industrial users in significant non-compliance by publishing in the Yakima Herald-Republic on January 23, 2009. A copy of the publication has been enclosed as **Exhibit H.** 

## S. Compliance Schedules

In accordance with § S6(4)(c)(5) of the City of Yakima's NPDES Permit, the following industrial users were put on compliance schedules.

#### Chief Orchards – 5200 W. Chestnut

• Submittal of 3<sup>rd</sup> quarter DMR upon receipt of warning letter issued 10/28/08.

Chief Orchards complied with the aforementioned requirement.

#### **Cintas** – 918 N. 5<sup>th</sup> Ave.

- Installation of pretreatment technology for FOG non-compliance due **February, 2008.**
- Installation of remote meter display- due January, 2008.
- SPCC due January 2008. Requested an extension due March 15, 2008.
- O&M Manual due January 2008. Requested an extension due March 15, 2008.
- Submittal of 3<sup>rd</sup> quarter DMR due upon receipt of warning letter. Cintas complied with the aforementioned requirements.

#### **JELD-WEN** – 1123 N. 6<sup>th</sup> Ave.

- O&M Manual due January 1, 2009.
- SPCC due January 1, 2009
- Final compliance/Baseline Monitoring Report due prior to discharge.
- Priority pollutant scans for discharge #EX002 and #EX003 due prior to discharge.

JELD-WEN complied with the aforementioned requirements.

Jewel Apple – 703 N. 1<sup>st</sup> Avenue

 Submittal of an Application for a Wastewater Industrial Discharge Permit for Discharge of Industrial Wastewater to the City of Yakima – due January 15, 2008. Installation of pretreatment technology that will treat/adjust Jewel Apple's wastewater pH to comply with the City's pH limit. – due March 3, 2009.
 Jewel Fruit complied with the aforementioned requirements.

#### Noel Canning – 1001 S. 1<sup>st</sup> St.

Installation of pretreatment technology for pH monitoring. – due March 31, 2008.

Noel Canning complied with the aforementioned requirement.

## T. The City of Union Gap / Terrace Heights Sewer District / City of Moxee Annual Pretreatment Reports

In accordance with the Special Agreements between the City of Yakima, the City of Union Gap, Terrace Heights Sewer District and the City of Moxee, the City of Union Gap, Terrace Heights Sewer District and the City of Moxee are responsible for the submittal of an annual Pretreatment report to the City of Yakima and to the Department of Ecology by February 15<sup>th</sup> of each year.

The City of Union Gap, Terrace Heights Sewer District and the City of Moxee Pretreatment Reports have been enclosed as *Exhibits I.* 

## U. 2009 - Planned Changes in the Pretreatment Program

• The City is currently reviewing outside vendors to reevaluate City of Yakima local limits. The City's local limit re-evaluation is to be completed by July 2010 for incorporation into the Wastewater Treatment Plant's next NPDES Permit cycle beginning June 30, 2011.