



City of Yakima

Annual Pretreatment Report

2009

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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 15th 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 470 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.

There were no changes to the City's Sewer Use Ordinance or Special Agreements in 2009.

C. Local Limits

The City of Yakima, in consultation with Curt McCormick of CWA Consulting Services, LLC. (CWACS) began a formal local limits revision early in August 2009. The City provided NPDES information, data on POTW operations, industrial user data and other information required for a re-evaluation of local limits. CWACS compiled the data and identified areas where additional data would allow refinement of various data elements used in local limits calculations. The City collected the additional data elements and provided this information to CWACS by December 2009.

CWACS and the City reviewed the Yakima River Toxics TMDL Technical Report (final draft) to assure that all pollutants of concern have been identified from quantifiable analytical data. CWACS evaluated and identified specific pollutants of concern beyond the basic metals suggested by EPA.

The City will determine how to most effectively adopt, implement and enforce the limits. These City decisions include determining the universe of industrial users for which limits will be developed, the form of those limits (concentration, mass or both), and whether or not accompanying Best Management Practices (BMPs) will be developed to enhance pollutant reduction efforts.

D. Staffing and Funding of the Pretreatment Program

There were no staffing or funding changes in 2009.

<u>Job Title</u>	<u>Number of Full Time Equivalents</u>
Pretreatment Supervisor	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. An inspection and possible testing are used to determine whether to add the possible industrial user to the Pretreatment Program. When an initial review or inspection 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 regarding chemical usage and discharge characteristics.

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

SIUs are notified of any changes to the Pretreatment Standards including the proposed local limits through newspaper Public Notice, written notification, telephone, and during inspections.

MIUs are notified of changes to Pretreatment Standards including the proposed local limits through newspaper Public Notice, 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
2. Discharges an average of twenty-five thousand gallons per day or more of process wastewater to the POTW (excluding domestic wastewater and non-contact cooling water); or
3. 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 A**. The SIU list also indicates when the City of Yakima inspected each facility in 2009.

H. Authorization to Discharge

Authorization to Discharge Temporary Permits

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

The City issued the following temporary 'Authorization to Discharge' permits during 2009.

1. **SLR International Corporation**, (Mike Staton) was issued an Authorization to Discharge (effective June 15, 2009 – July 15, 2009) to discharge up to 1,000 gallons of groundwater generated from collecting samples to assess environmental conditions of the former City of Yakima landfill.
2. **G-Logics, Inc.** (Rory Galloway) was issued an Authorization to Discharge (effective December 3, 2009 – December 18, 2009) to discharge up to 250 gallons of well-purge water from the Tiger Oil Corporation, former 24th and Nob Hill facility.

Copies of the Authorization to Discharge for SLR Corporation and G Logics have been included in **Exhibit B**.

I. Industrial Wastewater Discharge Permits

The City is responsible for issuing all SIUs 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. Ten Industrial Wastewater Discharge Permits were issued in 2009.

1. **Orchard Rite**, 1702 Englewood Ave., **Permit # CY-OR-01**. A five year permit renewal became effective on July 15, 2009 and expires on July 14, 2014. Orchard Rite manufactures agricultural equipment, including wind machines for frost control and nut harvesting equipment. This facility is listed as a SIU by the City and a Categorical Industrial User under 40 CFR 433.17.
2. **Finish Line Powder Coating, LLC**, 217 S. 2nd Ave. **Permit # CY-FLPC-02**. A five year permit renewal became effective on July 15, 2009 and expires on July 14, 2014. Finish Line etches and color powder coats prefabricated metal parts as specified by customers. This facility is listed as a SIU by the City and a Categorical Industrial User under 40 CFR 433.17.
3. **Hansen Fruit Company**, 10 E. Mead Ave., **Permit #CY-HF-09**. A five year permit, issued on November 23, 2009 became effective on January 15, 2010 and expires at midnight on January 14, 2015. Hansen Fruit sorts, grades, packs and stores fruit. Based on federal standards and the potential to upset the City's POTW the City classifies Hansen Fruit Company as a SIU.
4. **JELD-WEN, Inc.**, 1123 N. 6th Avenue, **Permit # CY-JW-10**. A five year permit was issued on February 26, 2009 and expires on February 25, 2014. 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 SIU.
5. **Longview Fibre Paper and Packaging Inc.**, 2001 Longview Fibre Ave., **Permit # CY-LF-12**. A five year permit became effective on May 15, 2009 and expires on May 15, 2014. Longview Fibre manufactures corrugated containers (cardboard boxes, etc.) Based on federal standards and the potential to upset the City's Publicly Owned Treatment Works (POTW), the City classifies Longview Fibre as a SIU.
6. **Michelsen Packaging Company**, 922 N. 1st Ave., **Permit # CY-MP-13**. A five year permit became effective on May 15, 2009 and expires on May 15, 2014. Michelsen Packaging manufactures packaging trays for the apple packing industry from

newspaper and mixed wastepaper. Michelsen Packaging is subjected to Federal wastewater discharge standards contained in 40 CFR Part 430, Subpart J, Pulp, Paper, and Paperboard Point Source Category, Secondary Fiber Non-Deink. This facility is listed as a SIU by the City and a Categorical Industrial User under 40 CFR Part 430.

7. **John I Haas Corporation**, 1710 River Road. **Permit #CY-JH-14**. A five year permit, issued on November 23, 2009 became effective on January 15, 2010 and expires on January 14, 2015. John I Haas extracts hops which are then sold as a flavoring for beer. Based on federal standards and the potential to upset the City's POTW the City classifies John I Haas Corporation as a SIU.
8. **Hops Extract Corporation**, 305 N. 2nd Ave., **Permit #CY-HE-15**. A five year permit became effective on August 15, 2009 and expires on August 14, 2014. Hops Extract Corporation produces hops extract and other modified hop products primarily for use in flavoring beer and other food products. Based on federal standards, the volume of discharge and the potential to upset the POTW, the City classifies Hops Extract as a SIU.
9. **Noel Canning Corporation**, 1011 S. 3rd St. **Permit #CY-NC-16**. A five year permit became effective on August 15, 2009 and expires on August 14, 2014. Noel Canning Corporation is a canning and bottling facility that produces soft drinks. Based on federal standards and the potential to upset the City's POTW the City classifies Noel Canning as a SIU.
10. **Seneca Foods Corporation**, 2418 River Road. **Permit # CY-SF-17**. A five year permit became effective on August 15, 2009 and expires on August 14, 2014. Seneca Foods produces fried apple chips and potato chips. Based on federal standards, the volume of discharge and the potential to upset the City's Publicly Owned Treatment Works (POTW), the City classifies Seneca Foods as a SIU.

Copies of the aforementioned permits were previously sent to Ecology.

J. Compliance Inspections

The City of Yakima conducted a compliance inspection on each SIU, at least once during 2009 in accordance with 40 CFR 403.8(f)(2)(v). A copy of the Compliance Inspection Report was sent to each of the SIUs.

K. SIU Sampling and Results

SIU sampling results for 2009 have been enclosed as **Exhibit C**.

The City of Yakima sampled each SIU at least once during 2009 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 SIU has a current wastewater discharge permits with the City; however, there were no discharges to the City's POTW in 2009. Therefore, no City sampling results are available for Dunollie Enterprises.

- **Dunollie Enterprises**, 805 N. 7th Avenue informed the City that plywood manufacturing would not occur at the facility. The only operation at the plant is the de-barker and chipper process for the Shawn Montee Log Yard. The facility was inspected by Pretreatment personnel on July 8, 2009. Pretreatment personnel observed no activity at the plywood facility and indicated that the remaining equipment is being parted or sold.

The following SIU requested termination of their wastewater discharge permit in July 2009. Therefore, sampling results are not available for Voelker Fruit.

- **Voelker Fruit**, 15 W. Mead Avenue, **Permit # CY-VF-08** informed the City that apple processing and packing did not occur during the previous three years and requested that Voelker Fruit's Permit # CY-VF-08 be terminated. (July 2009).

L. MIU Sampling and Results

The Pretreatment Program classifies 468 businesses as MIUs, 397 were inspected and/or sampled in 2009. The remaining MIUs are scheduled for inspection and sampling in the first part of 2010.

Results of MIU sampling for 2009 have been enclosed in **Exhibit D**.

M. Commercial and Residential Sampling and Results

The Pretreatment Program conducted sanitary sewer manhole monitoring of commercial users and residential users at key locations throughout the City.

Results of Commercial and Residential Sampling for 2009 have been enclosed in **Exhibit E**.

N. 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 District sampling port located at the Yakima WWTP.

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

O. 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 G**.

P. 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. Metals and organic priority pollutant removal rates
4. Biosolids

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 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 demonstrated 100% survival in the Acute WET testing performed during the months of August, September and October.

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

- The Spring/Summer chronic WET test (initiated in June) demonstrated 100% survival in the 100% effluent sample and 100% reproduction in the 100% effluent sample at Day 7. No toxicity was detected in the acute or chronic critical effluent concentrations of 53.8 and 9.88% sample respectively.
- The Summer/Fall chronic WET test (initiated in October) demonstrated no effect on survival or reproduction: the highest concentration with no observed effect was 100 percent effluent, which indicates that there was no effect at the acute and chronic critical effluent concentrations of 53.8 and 9.88% sample respectively.

As part of the Toxicity Identification/Reduction Evaluation (TI/RE) plan, which was required by the City's NPDES permit in response to significant effects in 2007 chronic toxicity tests, Toxicity Identification Evaluation (TIE) using the test species *Ceriodaphnia dubia* was conducted concurrent with the effluent samples collected in October 2009. Baseline testing which also doubled as the fall NPDES compliance test did not exceed NPDES toxicity limits. Three tests were performed concurrent with the baseline test.

- The first tested examined the effects of filtration with a 1.5 um glass-fiber filter to remove larger microorganisms and any potentially contaminated suspended solids.
- The second test examined the effects of chlorination followed by dechlorination of the effluent to remove any potential pathogenic bacteria or other microorganisms.
- The third test examined the effect of passing the effluent through a solid phase extraction column containing C18 (octadecyl) sorbent. The third test was coupled with a 'methanol add-back' test, in which the C18 column was eluted with methanol to recover non-polar organics extracted from the effluent. The methanol was then added to control water to mimic the concentration of organics that would be in 50 percent, 100 percent and 200 percent effluent concentrations. Test results indicated a statistically significant decrease in survival and reproduction in the 2x concentration, indicating that non-polar organics may be present but not at high enough concentrations to cause toxicity in the untreated effluent.

In response to the statistically significant decrease in survival and reproduction in the 2x concentration sample, the City requested Gas Chromatograph Mass Spectrophotometer (GCMS) tentatively identified compound (TIC) concentrations to determine if the POTW's effluent contained a pollutant(s) other than the reported priority pollutant metals (Table III, 40 CFR 122, Appendix D) or organic priority pollutants (Table II, 40 CFR 122, Appendix D) identified by EPA. It was determined that the TIC compounds did not provide evidence of a toxicity causing factor.

On February 2, 2010, Rick Frye, Department of Ecology Water Quality Manager, in consultation with Randall Marshall, Department of Ecology WET Test Coordinator, deemed Yakima's TI/RE plan was complete.

Results of 2009 priority pollutant testing for City of Yakima wastewater treatment plant influent, effluent, and biosolids, TICs, metal and organic priority pollutant removal rates, WET testing results, Phase I TIE test results and Ecology's response email indicating that the TI/RE plan is complete have been included have been as **Exhibit H**.

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 2009 City of Yakima Pretreatment Report.

Q. Pass Through and Upsets

There was no pass-through at the City's Wastewater Treatment Plant during 2009 that was directly attributable to wastes from industrial users.

Notice of Violation (NOV)

'Red Diesel' Slugload:

A slugload of 'red diesel' entered the wastewater treatment plant on February 3, 2009. The 'red diesel' was captured and diverted to the Wastewater Treatment Plant oil/water separator without upset to the Wastewater Treatment Plant. The City's Wastewater Division was contacted by Freeth (Fuel) Distributing on February 4, 2009 regarding the accidental discharge. Freeth (Fuel) Distributing was issued a Notice of Violation and invoiced for the City's labor and 'red diesel' removal expenses. Pass through or upset did not occur due to this discharge.

R. Effluent Violations

There were no effluent violations in 2009 that were directly attributed to industrial users.

S. 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 (FOG) in excess of the local limit of 100 mg/L.

MIU FOG Violations

BUSINESS NAME	ADDRESS	SAMPLE DATE	FOG mg/L (LIMIT 100 mg/L)	COMMENTS
Eddie's Grand Buffet	19 E. Yakima Ave.	06/03/09	1,454	Warning letter issued 6/22/09.
El Centenario Restaurant	202 S. 1st St.	06/04/09	183	Warning letter issued 6/22/09.
El Grullense Restaurant	1514 S. 1st St.	01/06/09	415	Warning letter issued 1/28/09.
Jack in the Box	2317 S. 1st St.	06/17/09	588	Warning letter issued 7/6/09.
KFC	107 S. 5th Avenue	11/09/09	204	Warning letter issued 11/19/09.
LaMorenita Bakery	117 E. Walnut	06/03/09	182	Warning letter issued 6/22/09.
Lewis and Clark	1114 Pierce	05/07/09	199	Warning letter issued 6/4/09.

McDonald's	1305 S. 1st St	03/17/09	418	Warning letter issued 3/31/09.
		09/29/09	297	Informational testing. McDonald's is working with the City to resolve this issue.
	1601 Lincoln Ave.	06/17/09	178	Warning letter issued 7/9/09.
		09/29/09	382	NOV issued 7/9/09.
	2326 S. 1st St.	09/29/09	315	Informational testing. McDonald's is working with the City to resolve this issue.
	3907 River Road	09/29/09	239	Informational testing. McDonald's is working with the City to resolve this issue.
5910 Summitview	06/29/09	202	Warning letter issued 7/7/09.	
Safeway	2204 W. Nob Hill Blvd	11/09/09	239	Warning letter issued 11/19/09.
Taco Bell	1602 W. Nob Hill Blvd.	03/25/09	290	Informational testing. Taco Bell is working with the City to resolve this issue.
	2124 S. 1st St.	02/02/09	388	Informational testing. Taco Bell is working with the City to resolve this issue.
	4002 Fruitvale	03/25/09	241	Informational testing. Taco Bell is working with the City to resolve this issue.
Tequilla's	29 W. Yakima Ave.	06/16/09	198	Warning letter issued 6/29/09.

SIU FOG Violations

INDUSTRY NAME	ADDRESS	SAMPLE DATE	FOG mg/L (LIMIT 100 mg/L)	SGT HEM (LIMIT 100 mg/L)	COMMENTS
Hops Extract (DSP Facility)	302 N. 2nd Ave.	03/31/09	314	11	Warning letter issued 4/30/09.
Cintas	918 N. 5th Ave.	02/03/09	230	105	Administrative Order with \$250 Admin. Penalty.
Longview Fibre	2001 Longview Fibre Rd.	06/09/09	477	*NT	Warning letter issued 6/22/09.
Michelsen's	922 N. 1st Ave.	07/08/09	272	NT	Warning letter issued 7/12/09.

*NT = Not Tested.

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

pH

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

SIU pH VIOLATIONS

BUSINESS NAME	ADDRESS	SAMPLE DATE	pH (Limit 5.5 - 12.0)	COMMENTS
Cintas	918 N. 5th Ave.	10/07/09	4.19	Warning letter issued 10/12/09.
Jack Frost	2820 River Rd.	04/22/09	3.18	Warning letter issued 4/20/09.

Jewel Apple	703 N. 1st Ave.	09/16/09	4.73	Warning letter issued 10/12/09. Jewel Apple is working with the City to resolve this issue.
		10/28/09	5.20	
		11/04/09	4.25	
		11/06/09	4.39	

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)

Warning letters were sent to the following facilities for late submittal of the DMRs.

SIU DMR VIOLATIONS

BUSINESS NAME	ADDRESS	DMR NON-SUBMITTAL	COMMENTS
Cintas	918 N. 5th Ave.	1st qtr. 2009	Warning letter issued 4/29/09.
Jewel Apple	601 N. 1st Ave.	August DMR	Warning letter issued 10/12/09.
Roche Fruit #13 & 46	601 N. 1st Ave.	1st qtr. 2009	Warning letter issued 4/28/09.

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

Notice of Violations

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

SIGNIFICANT NON-COMPLIANCE

BUSINESS/INDUSTRY NAME	ADDRESS	COMMENTS
Freeth (Fuel) Distributing	1025 N. 6th Ave.	Issued a Notice of Violation (NOV) on 2/19/09 for discharging a slugload of "red diesel" to the City's Wastewater Treatment Plant. Freeth (Fuel) Distributing was invoiced for labor and removal expenses associated with the discharge of prohibited material.
McDonald's Restaurant	1601 W. Lincoln Avenue	Issued a NOV on 7/9/2009 for violating the wastewater discharge limit of 100 mg/L for FOG. McDonald's is currently working with the City to correct this issue.

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 February 4, 2010. A copy of the publication has been enclosed as ***Exhibit I***.

T. 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.

Hops Extract, 305 N. 2nd Avenue

- Installation of a wastewater discharge flow meter for the DSP Facility. Due date: October 20, 2009.

Hops Extract complied with the aforementioned requirement.

John I Haas, 1710 River Road

- Installation of a unique sampling manhole and discharge meter for the CO2 Plant and ISO Plant.
- Installation of a new wastewater pipe and oil/water separator to independently capture and drain all CO2 Plant wastewater flows.
- Installation of a 5,000-gallon storage-cooling tank at the series of ISO Plant storage-cooling tanks for additional treatment capacity.
- Installation of a 1,500-gallon recovery basin in the new ISO Plant addition to recover alpha acids and prevent them from being discharged to the POTW.

Due date for the aforementioned items: April 30, 2010.

Michelsen Packaging, 922 N. 1st Avenue

- Submittal of written certification that Michelsen Packaging does not use chlorophenolic-containing biocides. Due date: May 15, 2009.

Michelsen Packaging complied with the aforementioned requirement.

Western Sweet Cherry Group, 5105 W. Nob Hill Avenue

- Re-route the North CA wastewater to a collection basin. The wastewater shall be land applied under a Department of Ecology permit.
- Re-route the outside hydrocooler wastewater to a collection basin. The wastewater shall be land applied under a Department of Ecology permit.
- Re-route the South CA wastewater to the floor sump basin inside the process facility at the southeast corner of the bin dump area, which drains to the City POTW.
- Install a wastewater discharge meter that represents the total flow of wastewater discharged from the WSCG facility.

Due date for the aforementioned items: May 30, 2010.

U. 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 15th of each year.

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

V. 2010 - Planned Changes in the Pretreatment Program

Local Limit revisions are scheduled to be completed in 2010. A copy of the City of Yakima Draft Local Limit Submittal has been enclosed as **Exhibit K**.

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