



City of Yakima

Annual Pretreatment Report

2018

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EXHIBITS

- Exhibit A** 2018 Pretreatment Newsletter
- Exhibit B** Chapter 7.60 Wastewater Collection and Treatment Rates and Charges-
Yakima Municipal Code Ordinance Amendment
- Acronym Glossary
- Exhibit C** Local Limits
- Exhibit D** Up-dated Non-Domestic Inventory
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 - Influent
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 - Metal and Priority Pollutant Removal Rates
 - Whole Effluent Testing (WET)
 - Spring/Summer 2018 –Chronic WET Test Results
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- Exhibit L** Special Agreement Pretreatment Annual Reports
- City of Union Gap Annual Pretreatment Report
 - Terrace Height Sewer District/City of Moxee Annual Pretreatment Report

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-six (26) significant industrial users (SIUs) and over 498 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 Sewer Use Ordinance or Special Agreement changes in 2018.

A copy of Yakima Municipal Code Chapter 7.60 Wastewater Collection and Treatment Rates and Charges is included in ***Exhibit B***.

C. Local Limits

There were no changes to the local limits in 2018. The City performs annual local limit reviews as a quick check for any obvious signs that local limits may not be adequately protective of its treatment works, its workers and the environment from the effects of interference and pass through. A list of City of Yakima local limits is included in ***Exhibit C***.

D. Staffing and Funding of the Pretreatment Program

There were staffing and funding changes in 2018. Codified sewer rate increases became effective January 1, 2018, including increases in the monthly sewer pretreatment fee for MIU's and strong waste surcharges. The City intends to continue to provide adequate funding for staffing, capital equipment and supplies for Pretreatment in 2019.

<u>Job Title</u>	<u>Number of Full Time Equivalent</u>
Pretreatment Supervisor	1
Environmental Compliance Specialist	1
Pretreatment Crew Leader	3
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 and MIUs are notified of any changes to the Pretreatment Standards including the proposed local limits through newspaper Public Notice, written notification, telephone conversations, and during inspections.

A copy of the 2018 Pretreatment Newsletter was sent by mail to all SIU's. This newsletter is included in **Exhibit A**

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 waste stream 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.

Businesses that are classified as an MIU include food service establishments, automotive facilities, dental and medical clinics, grocery stores, laundromats, schools, jails, assisted living facilities, as well as miscellaneous businesses deemed by the City as having the potential to cause interference or pass-through at the POTW.

An updated non-domestic inventory that includes both SIUs and MIUs has been enclosed as **Exhibit D**. The SIU list also indicates the date that each facility was inspected in 2017.

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 2017.

1. **Nob Hill Water Association** (Dave England) was issued an Authorization to Discharge (effective January 1, 2018 – December 31, 2018) to batch discharge potable water used to flush dead ends or new mains at various locations throughout the Nob Hill Water system.

Copies of the Authorization to Discharge for Nob Hill Water Association, and Associated Environmental Group have been included in **Exhibit E**.

I. Industrial Wastewater Discharge Permits

The City is responsible for issuing all SIUs an industrial wastewater discharge permit. Industrial wastewater discharge permits are issued for a specified time period of up to five (5) years. Permits issued by Ecology and delegated to the City of Yakima will be re-written and issued to the SIU by the City. Wastewater discharge permits, however, may be

extended at the discretion of the Wastewater Manager. One new Industrial Wastewater Discharge Permits was re-issued in 2018.

1. **Cintas**, 901 N. 5th Ave. **Permit #CY-CIN-08**. A five year permit became effective on January 1, 2018 and expires at midnight on December 31th, 2022. Cintas is a laundry service company that is subject to federal discharge standards contained in the general pretreatment regulations, 40 CFR 403. Based on federal standards and the potential to upset the City's POTW the City classifies Cintas as a Significant Industrial User (SIU).

A copy of the aforementioned permit were previously sent to Ecology.

J. Compliance Inspections

The City of Yakima conducted a compliance inspection on twenty-six of the twenty-six SIUs, at least once during 2018 in accordance with 40 CFR 403.8(f)(2)(v) and § S.6.A.d. of the City's NPDES Permit. All facilities are subject to random inspection. A copy of the Compliance Inspection Report was sent to each of the SIUs.

K. SIU Sampling Results

SIU sampling results for 2018 have been enclosed as **Exhibit F**.

The City of Yakima sampled each SIU at least once during 2018 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.

L. MIU Sampling Results

The Pretreatment Program classifies 498 businesses as MIUs, 368 were inspected and/or sampled in 2018.

Results of MIU sampling for 2018 have been enclosed in **Exhibit G**.

M. Commercial and Residential Sampling Results

The Pretreatment Program conducted sanitary sewer monitoring of commercial and residential users at key locations throughout the City. This information will be used in a future detailed local limit recalculation.

Results of Commercial land Residential Sampling for 2018 have been enclosed in **Exhibit GH**

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. Terrace Heights was in compliance with 2018 monitoring.

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

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, Pierce Avenue, Rainier Avenue and Valley Mall Boulevard. Union Gap was in compliance with 2018 monitoring.

Results of Union Gap sampling have been enclosed in **Exhibit J**.

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. Biosolids
4. Metals and organic priority pollutant removal rates

Whole Effluent Toxicity (WET) Testing

Spring/Summer 2018

The Spring/Summer Chronic WET test was initiated on June 11, 2018 using the test species *Pimephales promelas* (Fathead minnow). The City passed the Chronic WET test due to the fact that the highest concentration with no observed effect (NOEC) was 100 percent effluent for both survival and reproduction, indicating no statistically significant difference occurred between the control and the chronic critical effluent concentration (CCEC) of 9.88 percent sample.

Fall/Winter 2018

Chronic WET testing was initiated on October 3, 2018 using the test species, *Ceriodaphnia dubia* (water flea). The highest concentration with no observed effect (NOEC) was 100 percent effluent for survival and reproduction. There is no statistically significant difference

between the control and acute critical effluent concentration (ACEC) of 53.8 percent effluent or the chronic critical effluent concentration (CCEC) of 9.88 percent effluent.

Results of Wastewater Sampling at the Treatment Plant have been enclosed in **Exhibit K**.

Q. Pass Through and Upsets

There was no pass-through at the City's Wastewater Treatment Plant during 2018 that was directly attributable to wastes from industrial users.

R. Effluent Violations

There were no effluent violations in 2018 that were directly attributed to industrial users.

S. Violations and Enforcement Actions

Upon these violations occurring, either warning letters, phone calls, emails, or follow-up sampling was done to address each violation. 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.

SIU Violations						
Business Name	Address	Violation	Result (mg/L)	F/U Results (mg/L)	Date	Enforcement Response
Cintas	901 N. 5th Ave.	Late DMR's 2nd & 3rd Qtr	-	-	-	Warning
Del Monte	108 W. Walnut Ave.	pH	12.2	9.5	11/8/2018	Follow-up Resample
Evans Fruit	5002 Tieton Dr.	Missed Sampling 3rd & 4th Qtr	-	-	-	Warning
Frosty Packing	1225 N. 28th Ave.	Late DMR's 2nd & 3rd Qtr	-	-	-	Warning
John I Haas	1112 N. 16th Ave.	3rd Qtr FOG	286	23	7/18/2018	Follow-up Resample
Noel	1011 S. 3rd St.	Missed Sampling 2nd & 4th Qtr	-	-	-	Warning
Roche #2	401 N. 1st Ave.	Late DMR's all Qtr's. pH	4.89	5.46, 6.82, 6.73	1/4/2018	Warning
Roche #46	115 Poplar St.	Late DMR's 1st & 3rd Qtr	-	-	-	Warning
Seneca	2418 River Rd.	pH	5.43	9.08, 10.19, 8.77, 9.03	5/16/2018	Follow-up Resample
WA Fruit Cherry	1506 N. 6th Ave.	Late DMR's 2nd & 3rd Qtr & Cu Exceedance	0.344	0.0761	6/11/2018	Follow-up Resample
WA Fruit River Rd. (A)	1007 River Rd.	Late DMR 3rd Qtr	-	-	-	Warning
WA Fruit 6th Ave (G)	1500 N. 6th Ave.	Late DMR 3rd Qtr	-	-	-	Warning

MIU VIOLATIONS								
BILLING NAME	ADDRESS	SAMPLE DATE	VIOLATION	LAB RESULT (mg/L)	ENFORCEMENT ACTION	RESPONSE RECEIVED	F/U DATE	F/U RESULT
McDonalds/ 1st&Nob Hill	1305 S 1st St	1/30/2018	1st FOG	322	None, location- torn down/remodeled			
Essencia Artisan Bakery	4 N 3rd St	3/14/2018	1st FOG	150	No Action Taken			
Burger King/ Yakima Ave	1605 E. Yakima Ave	4/10/2018	1st FOG	524	Warning Letter	5/8/2018	6/13/2018	1463
El Grullense	1514 S 1st St	4/10/2018	1st FOG	303	Warning Letter	No	6/13/2018	46
China Buffet	2616 W Nob Hill Blvd	4/12/2018	1st FOG	289	Warning Letter	No	6/13/2018	81
Creekside West Bar & Grill	4000 Creekside Loop	4/12/2018	1st FOG	250	Warning Letter	5/4/2018	6/14/2018	24
Taco Bell/Orchard Park	230 S 72nd Ave	4/18/2018	1st FOG	165	Warning Letter	No	6/14/2018	371
Kyoto	2405 W Wasginton Ave	4/26/2018	1st FOG	266	Warning Letter	6/11/2018	6/14/2018	13
West Valley High School	8902 Zier Rd	5/8/2018	1st FOG	980	Warning Letter	5/30/2018	10/2/2018	14
Nick's Market/Mercado Latino II	718 S 6th St	6/6/2018	1st FOG	278	Warning Letter	No	8/13/2018	276
Burger King/ Yakima Ave	1605 E. Yakima Ave	6/13/2018	2nd FOG	1463	Warning Letter	7/10/2018	8/13/2018	949
Taco Bell/Orchard Park	230 S 72nd Ave	6/14/2018	2nd FOG	371	Warning Letter	No	8/13/2018	17
Red Robin	2702 W Nob Hill Blvd	6/12/2018	1st FOG	203	Warning Letter	7/23/2018	8/13/2018	395
McDonalds/ River Rd	3907 River Rd	6/20/2018	1st FOG	210	Warning Letter	No	8/13/2018	328
Taco Bell/ N 40th	4002 Fruitvale Blvd	6/28/2018	1st FOG	186	Warning Letter	8/21/2018	8/28/2018	37
KFC	107 S 5th St	7/12/2018	1st FOG	167	Warning Letter	No	8/28/2018	186
Ponderosa Retirement Center	3300 Engelwood Ave	7/12/2018	1st FOG	1700	Warning Letter	8/7/2018	8/13/2018	85
2nd St Market/Antojitos	131 S 2nd St	7/24/2018	1st FOG	213	Warning Letter	No	8/28/2018	186
McDonalds/ Lincoln	1601 Lincoln Ave	7/31/2018	1st FOG	173	Warning Letter	No	11/13/2018	351
McDonalds/ River Rd	3907 River Rd	8/13/2018	2nd FOG	328	Warning Letter	No	11/14/2018	174
Nick's Market/Mercado Latino II	718 S 6th St	8/13/2018	2nd FOG	276	Warning Letter	No	11/14/2018	97
Red Robin	2702 W Nob Hill Blvd	8/13/2018	2nd FOG	395	Warning Letter	No	11/14/2018	272
Burger King/ Yakima Ave	1605 E. Yakima Ave	8/13/2018	3rd FOG	949	AO Letter+\$250 Fine	9/26/2018		
KFC	107 S 5th St	8/28/2018	2nd FOG	186	Warning Letter	No	11/13/2018	87
2nd St Market/Antojitos	131 S 2nd St	8/28/2018	2nd FOG	186	Warning Letter	No	10/2/2018	117
Domino's/Pasta Pronto	420 S 72nd Ave	8/28/2018/ 9/19/2018	1st FOG	174	Warning Letter	No	11/13/2018	36
Pizza Hut/ Nob Hill	2002 W Nob Hill Blvd	9/4/2018	1st FOG	162	Warning Letter	No	11/14/2018	179
2 Busy 2 Cook	6002 Summitview	9/4/2018	1st FOG	289	Warning Letter	1/16/2019		
Casino Carribean	1901 Boggess Ln	9/5/2018	1st FOG	370	Warning Letter	9/22/2018	11/13/2018	334
McDonalds/Summitview	5910 Summitview	9/12/2018	1st FOG	241	Warning Letter	No	11/14/2018	210
Cowiche Canyon	202 E Yakima Ave	10/4/2018	1st FOG	156	Warning Letter	10/15/2018	11/13/2018	50
Burger Ranch/ S 1st St	1801 S 1st St	10/8/2018	1st FOG	248	Warning Letter	No	12/12/2018	3470
Jack in the Box	2317 S 1st St	10/10/2018	1st FOG	282	Warning Letter	No	12/10/2018	75
KFC/A&W	2325 S 1st St	10/10/2018	1st FOG	151	Warning Letter	11/6/2018	12/10/2018	91
Taco Bell/ S 1st St	2124 S 1st St	11/5/2018	1st FOG	254	Warning Letter	11/20/2018	1/23/2019	406
El Porton	4808 Tieton Dr	11/8/2018	1st FOG	182	Warning Letter	12/6/2018	12/10/2018	68
Mickey's Pub/Orion	202 E Chestnut Ave	11/8/2018	1st FOG	267	Warning Letter	11/21/2018	1/23/2019	221
Panaderia Delicias	1705 Fruitvale Blvd	11/8/2018	1st FOG	175	Warning Letter	11/28/2018	1/23/2019	270
Casino Carribean	1901 Boggess Ln	11/13/2018	2nd FOG	334	Warning Letter	11/21/2018		
McDonald's/ Lincoln Ave	1601 Lincoln Ave	11/13/2018	2nd FOG	351	Warning Letter	No	1/17/2019	1143
McDonald's/ Summitview	5910 Summitview	11/13/2018	2nd FOG	210	Warning Letter	No	1/17/2019	224
Pizza Hut/ Nob Hill	2002 W Nob Hill Blvd	11/14/2018	2nd FOG	179	Warning Letter	No	1/16/2019	250
Red Robin	2702 W Nob Hill Blvd	11/14/2018	3rd FOG	272	AO Letter+\$250 Fine	No	1/16/2019	95
McDonald's/ River Rd	3907 River Rd	11/14/2018	3rd FOG	174	AO Letter+\$250 Fine	No	1/17/2018	199
Panda Express	6560 Nob Hill Blvd	11/26/2018	1st FOG	213	Warning Letter	12/3/2018	1/23/2019	357
Burger Ranch/ S 1st St	1801 S 1st St	12/12/2018	2nd FOG	3470	Warning Letter	No	1/23/2019	277

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.

Burger King: 1605 E. Yakima Ave.

1. **Within 30 days**, provide an action plan to the City outlining installation and operation of additional pretreatment technology to treat Burger King's wastewater to a level that complies with the City's wastewater discharge limits, including the limits for FOG concentrations **or** provide an action plan that outlines the implementation of Best Management Practices (BMPs) to provide wastewater that complies with the City's wastewater limits, including the limits for FOG concentrations.
2. **Within 180 days**, complete installation and begin operation of additional pretreatment technology to treat Burger King's wastewater to a level that complies with the City's wastewater discharge limits, including the limits for FOG concentrations **or** implement BMPs to provide wastewater that complies with the City's wastewater limits, including the limits for FOG concentrations. One BMP is to increase the frequency of grease trap cleaning.
3. **Pay an administrative penalty of \$250.00** for the August 13, 2018 violation described above. The administrative penalty shall be issued by the City Finance Department in accordance with YMC § 7.65.240 and shall be paid by the invoice due date.
4. **Pay a FOG strong waste surcharge** for discharging FOG at a concentration of 949 mg/L. The FOG strong waste surcharge is in accordance with YMC § 7.60.020 B., and will be included in your next wastewater bill. This charge shall remain until which time Burger King resolves this issue to the satisfaction of the City.

Provide a written report to the City, by the last day of each month for the next six (6) months, describing Burger King's progress in the installation and operation of additional pretreatment technology **or** Burger King's progress in implementing BMPs that will comply with the City's wastewater limits.

McDonalds: 3907 River Rd.

1. **Within 30 days**, provide an action plan to the City outlining installation and operation of additional pretreatment technology to treat Red Robin's wastewater to a level that complies with the City's wastewater discharge limits, including the limits for FOG concentrations **or** provide an action plan that outlines the implementation of Best Management Practices (BMPs) to provide wastewater that complies with the City's wastewater limits, including the limits for FOG concentrations.
2. **Within 180 days**, complete installation and begin operation of additional pretreatment technology to treat McDonald's wastewater to a level that complies with the City's wastewater discharge limits, including the limits for FOG concentrations **or** implement BMPs to provide wastewater that complies with the City's wastewater limits, including

the limits for FOG concentrations. One BMP is to increase the frequency of grease trap cleaning.

3. **Pay an administrative penalty of \$250.00** for the November 14, 2018 violation described above. The administrative penalty shall be issued by the City Finance Department in accordance with YMC § 7.65.240 and shall be paid by the invoice due date.
4. **Pay a FOG strong waste surcharge** for discharging FOG at a concentration of 174 mg/L. The FOG strong waste surcharge is in accordance with YMC § 7.60.020 B., and will be included in your next wastewater bill. This charge shall remain until which time McDonald's resolves this issue to the satisfaction of the City.
5. **Provide a written report to the City, by the last day of each month** for the next six (6) months, describing McDonald's progress in the installation and operation of additional pretreatment technology **or** McDonald's progress in implementing BMPs that will comply with the City's wastewater limits.

Red Robin: 2706 W. Nob Hill Blvd.

1. **Within 30 days**, provide an action plan to the City outlining installation and operation of additional pretreatment technology to treat Red Robin's wastewater to a level that complies with the City's wastewater discharge limits, including the limits for FOG concentrations **or** provide an action plan that outlines the implementation of Best Management Practices (BMPs) to provide wastewater that complies with the City's wastewater limits, including the limits for FOG concentrations.
2. **Within 180 days**, complete installation and begin operation of additional pretreatment technology to treat Red Robin's wastewater to a level that complies with the City's wastewater discharge limits, including the limits for FOG concentrations **or** implement BMPs to provide wastewater that complies with the City's wastewater limits, including the limits for FOG concentrations. One BMP is to increase the frequency of grease trap cleaning.
3. **Pay an administrative penalty of \$250.00** for the November 14, 2018 violation described above. The administrative penalty shall be issued by the City Finance Department in accordance with YMC § 7.65.240 and shall be paid by the invoice due date.
4. **Pay a FOG strong waste surcharge** for discharging FOG at a concentration of 272 mg/L. The FOG strong waste surcharge is in accordance with YMC § 7.60.020 B., and will be included in your next wastewater bill. This charge shall remain until which time Red Robin resolves this issue to the satisfaction of the City.
5. **Provide a written report to the City, by the last day of each month** for the next six (6) months, describing Red Robin's progress in the installation and operation of additional pretreatment technology **or** Red Robin's progress in implementing BMPs that will comply with the City's wastewater limits.

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 **Exhibit L**.

V. 2018 - Planned Changes in the Pretreatment Program

A "3-Party Wholesale Service Agreement" for wholesale wastewater treatment and disposal between the City of Yakima, Union Gap and the Terrace Heights Sewer District was approved in November of 2014. Currently, the Department of Ecology (Ecology) acts as the Control Authority over the jurisdictions of Terrace Heights Sewer District/City of Moxee and the City of Union Gap. Ecology issued administrative order #16086 to The City of Yakima on November 19, 2018. This order established the due date of June 1, 2019 for the City's submittal of an application for pretreatment authority in Union Gap and Terrace Heights/ Moxee. The City will be delegated the authority of writing and issuing wastewater discharge permits to extra-jurisdictional SIU's following Ecology's approval of the submittal.

"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."

Michael A. Davis 4/10/19 Wastewater - Division Manager
Signature Date Title