

CITY OF YAKIMA

2020 PRETREATMENT

NEWSLETTER



Updates in 2020

It is not news that we've been facing a global pandemic due to Covid-19 for most of 2020. This has caused the Pretreatment Program to alter some of the ways we do things. We have had to change our work spaces, our daily routines, and some ways we administer the program. Namely, not being able to conduct in-person annual inspections. Scott and Shaun have taken to reviewing the inspection forms with Industries via phone and email. We would like to thank all SIUs for their commitment to the environment in the midst of this pandemic. Thanks to your cooperation, we have been able continue running our Program and I am grateful to say, we have all been able to remain healthy throughout the year and wish the same for all of our Industries.

Our Pretreatment Team

Pretreatment Supervisor: Jaime Thompson

Environmental Compliance Specialist: Nathan Regal

Pretreatment Crew Leaders: Shaun Rehfield, Scott Qualley, Chris Rasmusson

Pretreatment Technicians: Mario Lamas, Miguel Covarrubias, Ray Colton

2021 Utility Rate Increases

The City of Yakima's Pretreatment Program is fully funded by fees paid by the businesses and industries that we serve. This funding covers Pretreatment personnel, equipment purchasing and maintenance costs, as well as standard laboratory analysis. In order to cover these costs, the City of Yakima has approved a rate hike to take effect in January of 2021.

2020 100% Compliance Recognition

23 out of 29 SIUs achieved 100% Compliance with Pretreatment Regulations and Permit Requirements. Way to go! The City would like to thank you for your commitment to the environment!

ATTENTION FRUIT PACKERS!

Please contact the Pretreatment Office a couple of weeks prior to start-up. This allows the City to schedule sampling events and inspections as required by the City's NPDES permit.

NEW RATES EFFECTIVE JANUARY 1, 2021

See page 2 for details

YMC 7.60.020 B Strong Waste Surcharge Rates

	Effective Jan. 1, 2021	Effective Jan. 1, 2022	Effective Jan 1, 2023
Unit cost per lb. BOD	\$ 0.6424	\$ 0.6552	TBD
Unit cost per lb. TSS	\$ 0.5956	\$ 0.6075	TBD
Unit cost per lb. FOG	\$ 0.4178	\$ 0.4292	TBD

YMC 7.60.020 A.1.B Wastewater Volume Charge

	Effective Jan. 1, 2021	Effective Jan. 1, 2022	Effective Jan. 1, 2023
Unit cost per hundred cubic feet (ccf)	\$ 3.49	\$3.59	TBD

SAMPLING FEES		RATES
First Day Sampling		\$ 265.72
Each subsequent day in the same sampling period		\$ 109.19
LABORATORY TESTING FEES		
BOD-Biochemical Oxygen Demand		\$ 57.60
TSS-Total Suspended Solids		\$ 57.60
pH		\$ 28.79
BOD Soluble		\$ 86.39
COD		\$ 57.60
COD Soluble		\$ 86.39
TDS		\$ 57.60
Alkalinity (Carbonate)		\$ 28.79
Ammonia (Ion Selective Probe)		\$ 28.79
Chlorine Residual (Colorimetric)		\$ 28.79
Dissolved Oxygen (Azide)		\$ 28.79
Dissolved Oxygen (Membrane)		\$ 28.79
Fecal Coliform		\$ 86.39
FOG-Fats, Oils & Grease		\$ 115.20
MPN		\$ 575.95
Nitrate		\$ 57.60
Nitrite		\$ 57.60
Organic/Volatile Acids		\$ 28.79
Sulfide		\$ 57.60
Sulfite		\$ 57.60
Total Volatile Solids		\$ 57.60
BNA Semi-volatile Organics		*Outside Market Costs
BTEX (Benzene, toluene, ethylbenzene, xylene)		*Outside Market Costs
Metals		\$ 439.41
Metals Graphite Furnace		\$ 615.17
Pesticides / PCB's		*Outside Market Costs
Volatile Organics		*Outside Market Costs
Misc. Tests		*Outside Market Costs

*If an outside laboratory conducts this test, the fee will be based on the actual cost of the test performed, plus any related costs and taxes incurred. Test may include Captan, Cyanide, DPA, Scholar, Priority Pollutant Scan, Semi-volatiles, SOPP, TBZ, Total Nitrogen package including TKN, NH4, NO3, NO2, Total Phosphorus, TPH

These rates are in accordance with 7.60.105 E. of the City of Yakima's Municipal Code



INFORMATION

SELF MONITORING REQUESTS

The City is requesting that Significant Industrial Users (SIUs) submit to the Pretreatment office a **written statement indicating whether self-monitoring will be performed by the SIU, or if the SIU wishes for the City to perform sampling and testing** of all parameters at the required frequency for the upcoming 2021 production year. Each SIU shall be responsible for the cost associated with all sampling and testing. YMC § 7.60.105 E. defines the charges and fees for related sampling and laboratory testing fees.

In accordance to the City's National Pollutant Discharge Elimination System (NPDES) Permit #WA-0024023 as issued by the Department of Ecology, it is the City's discretion to decide whether a SIU may conduct self-monitoring. It is the intent, however, of the City to allow SIUs to become more involved in their wastewater discharge responsibilities by allowing self-monitoring.

If the Permittee (City) elects to conduct sampling of a SIU's discharge in lieu of the user self-monitoring, it shall sample and analyze for all regulated pollutants in accordance with 40 CFR Part 403.12(b)(5)(ii)-(v), 40 CFR 403.12(g), and 40 CFR Part 136. The character and volume of the samples shall be representative of the discharge and shall provide adequate data to determine compliance, but in no case should sampling occur less than two (2) times per year.

Please be aware that if self-monitoring is selected, it is the responsibility of the SIU to sample and test parameters outlined in their wastewater discharge permit at the required frequency. If, at the end of the year, this requirement is not fulfilled, the SIU shall be deemed out of compliance with their wastewater discharge permit, resulting in enforcement action by the City including the forfeiture of future self-monitoring privileges. If your SIU chooses self-monitoring, the City of Yakima is still required to sample and test each SIU at least once per year in accordance with the City's NPDES Permit.

SELF MONITORING REQUIREMENTS

All samples must be handled in accordance with the specific container storage requirements, preservation techniques, and holding times identified in 40 CFR 136.3, Table II, to ensure sample integrity. Samples not collected or analyzed in accordance with 40 CFR 136 shall be deemed invalid. **Please remember:** A copy of lab reports and chain of custodies must accompany the discharge monitoring reports (DMRs). Sample types shall be collected as outlined in the wastewater discharge permit.

A "**24 hour composite**" sample shall mean a flow-proportioned mixture of not less than eight discrete aliquots. Each aliquot shall be a grab sample of not less than 100 mL and shall be collected, composited, and preserved in accordance with 40 CFR, Part 136 and amendments.

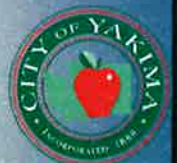
A "**Grab**" sample is an individual sample collected in less than 15 minutes, without regard for flow or time. Grab samples will be collected during business hours.

A "**Grab-composite**" is a minimum of four grab samples collected, composited, and preserved over a period of 24 hours to provide a representative sample of effluent being discharged.

If self-monitoring analytical results indicate a violation of discharge limits contained in the permit, the permittee must notify the City within **24 hours** of becoming aware of the violation. The permittee must also repeat the sampling and submit the analysis to the City within **30 days** of becoming aware of the violation.

QUESTIONS?

Contact: Jaime Thompson
Jaime.Thompson@yakimawa.gov
509-249-6816



INFORMATION

Annual Pretreatment Compliance Inspections

The Industrial Pretreatment Program is required to inspect all SIUs at least once a year (40 CFR 403.8(f)(2)(v)). However, additional inspections may be necessary depending on issues such as variability of effluent and its effect on the SIUs discharge, and the facility's compliance history. The majority of inspections are unannounced as are the required sampling of effluent that the City is responsible for collecting according to each individual permit guidelines. Inspections typically take an hour and encompass, or may encompass, the following:

- ◆ Gathering current data on the SIU
- ◆ Confirming or determining compliance status
- ◆ Determining completeness and accuracy of performance and compliance records
- ◆ Assessing the adequacy of self-monitoring and/or reporting requirements, monitoring locations, and compliance of imposed limitations and pollutants of concern
- ◆ Evaluating operation and maintenance and overall performance of the SIUs pretreatment system
- ◆ Evaluating the effectiveness of the Spill and Slugload Control Plan and the potential for loadings
- ◆ Identifying noncompliance needing resolution, issues requiring action, and obtaining data to support enforcement actions
- ◆ Suggesting pollution prevention opportunities and collecting samples if needed

The primary goal of Pretreatment is to monitor compliance with the laws and ordinances that have been put in place to protect the environment. We are here to work in a regulatory fashion but realize that most of the time, helping our businesses and industries to understand the laws and what is expected, is the only thing that stands in the way of compliance. If you are having difficulty understanding the language and expectations of your permit, please reach out, we are happy to work with you.

How to Prepare for a Compliance Inspection

The City of Yakima's Pretreatment Program wishes to continue forging strong relationships with its businesses and industries, and to make it a personal goal to educate and work with them on following guidelines. Here are a few tips on how you can be prepared for a Pretreatment Compliance Inspection.

- ◆ Know your permit—not just submission dates and capacity limits, but the entire permit.
- ◆ Maintain updated lists and SDS sheets for all chemicals and raw materials onsite.
- ◆ Notify the City 90 days prior to any changes taking affect in the production process, or new construction, that could effect the wastewater discharge.
- ◆ Avoid bad housekeeping issues. ALL records are required to be accessible. If they are not, and the records retention or storage system seems unorganized, it may invite further investigation.
- ◆ Can your plant operators find the SOPs, SPCC, and the O&M and are they located in the proper place?
- ◆ Are all spills reported within 24 hours?
- ◆ Maintain and regularly check the secondary containment systems.
- ◆ Perform self audits periodically to test preparedness.
- ◆ DOCUMENT! DOCUMENT! If it isn't written or recorded, it **DIDN'T** happen.



INFORMATION

IMPORTANT DATES

Refer to your City issued Industrial Wastewater Permit for the following dates:

PERMIT EXPIRATION DATES!

Applications for permit renewal need to be submitted
120 days before the expiration of the current permit.

PLAN REVIEW DATES!

Spill/Slugload Plan

reviews and updates are due **every other year**.

Operation & Maintenance Manual

reviews and updates are due **annually**.

Discharge Monitoring Reports (DMRs)

DMRs are to be **postmarked no later than the 15th** of the month following the monitoring period. Proper submittal of DMRs is a condition of the wastewater discharge permit. SIUs that routinely submit the DMRs late, or not at all, shall be issued Notice of Violations. Such actions may lead to penalties as outlined in the City's adopted Enforcement Response Plan (ERP). This will also count against consideration for the 100% Compliance Award.

Regardless of which entity, SIU or City, conducts sampling and testing of all the parameters at the required frequencies, the SIU is still responsible for submitting DMRs to the City of Yakima for flow and pH. Flow and pH are to be measured per discharge event. This means each day that there is a discharge by the SIU, the amount of flow and pH is to be logged on the DMR. The City is requiring meter reads on the DMRs, for those SIUs that have discharge meters. This will allow comparison with utility billing meter reads. If you have any questions or need an updated DMR sheet please contact Nathan Regal at (509)576-6781. It is the responsibility of the SIU to ensure the Wastewater meter is in proper working condition by providing any needed calibration/maintenance.

DMRs must be submitted whether or not the SIU was discharging during the monitoring period. If no discharge has occurred, or if the SIU was not operating during that time frame, the permittee shall still submit the DMR form as required with the words **"No Discharge"** entered in place of the applicable monitoring results.



DID YOU KNOW?

HOW TO AVOID VIOLATIONS

1. The most common violation is either late, or forgotten, submissions of DMRs and required reporting documents. Plan ahead, know your deadlines, and set a reminder. Your permit outlines all specific dates for all required submissions.
2. Report any anticipated changes that may be taking place in the future. Remember, if there are plans of making changes to procedures and materials in your daily processes, you must submit a Modification Request for approval 90 days prior to any changes being made.

Toxic Organic Management Plans (TOMP)

- Of the SIUs the City currently permits, this applies to Categorical Metal Finishers ONLY.
- Metal Finishers must conduct Total Toxic Organics (TTOs) analysis twice per year.
- A TOMP can be submitted in lieu of performing TTO analysis.
- A Certification Statement must be submitted, in lieu of the analysis, with each DMR to reinforce commitment to the TOMP.
- A new TOMP shall be submitted each permit cycle. If any changes are made during a permit cycle, the updated TOMP shall be submitted to the City.
- Contact the Pretreatment Department for more information.

**The City of Yakima Wishes
You Success for the New Year!**

