

**2009**

**GUIDANCE FOR COMPLETING**

**OREGON DEQ**

**PRETREATMENT ANNUAL**

**REPORT FORMS**

**Revisions**

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November 13, 1996

October 14, 1999

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## INSTRUCTIONS

*Note: Beginning with the Report for calendar year 2002 all pretreatment delegated municipalities in Oregon must submit to the Department's Pretreatment Program Coordinator in Portland a completed Pretreatment Annual Report in accordance with this format, pursuant to NPDES permit Schedule E and 40 CFR 403.12(i).*

**Form 1** – Self-explanatory. For “NPDES Permit Number(s)” include DEQ’s NPDES Permit Number(s) and EPA’s “OR” Reference Number(s) found on the cover page of the NPDES Permit(s).

**Form 2** – List all pretreatment program materials (i.e., sewer use ordinances, local limits, implementation procedures, forms, etc.) that fall into the following categories:

- ◆ Item 1. Approval date of original pretreatment program and date incorporated into NPDES permit.
- ◆ Item 2. Materials that are currently being revised or developed by the POTW. Include status of the revisions and the general reason for the proposed changes. In particular, any materials that have been returned by DEQ with comments, and any responses required in Pretreatment Compliance Inspections (PCIs) or Audits, must be addressed in this section. Also, include an approximate date that the materials will be submitted to DEQ for review and approval.
- ◆ Item 3. Materials that have been submitted to DEQ for review and approval. Please indicate the date that these materials were sent to DEQ.
- ◆ Item 4. Materials that were approved by DEQ. Identify program modifications made since original pretreatment program approval for each program element and the dates the modifications were incorporated into your NPDES permit (e.g., any modifications to Municipal Code, Interjurisdictional Agreement(s), Local Limits, Enforcement Response Plan, Pretreatment Program Procedures, etc.).
- ◆ Item 5. List any other noteworthy pretreatment activities or accomplishments for the calendar year.

**Form 3** – The POTW must include all treatment plant influent, effluent and sludge toxics and non-conventional pollutants monitoring data collected during the calendar year (please do not include Discharge Monitoring Report (DMR) data for conventional pollutants). This will include, at a minimum, the six days of monitoring required by most NPDES permits that contain pretreatment conditions. All data must be provided. Averages or selected representative results are not sufficient. Where the POTW has monitored more frequently than required by its permit, the additional data must also be provided. The POTW must ensure that its laboratory or its contract laboratory uses detection levels or minimum recovery levels that are adequate to evaluate for pass through. The POTW must ensure that it meets minimum toxic pollutant monitoring requirements of its NPDES permit. The Department recommends that the POTW schedule toxic pollutant monitoring events to ensure enough time to resample in the event that any required samples are invalidated for any reason.

*(Note: Form 3 Instructions are Continued on Next Page)*

The POTW can select the most convenient method of presenting these data as long as the following information is included:

- ◆ Date samples were collected.
- ◆ Analytical results for all parameters (including units).
- ◆ Treatment plant flow (influent and effluent) at the time of sampling.
- ◆ Treatment plant removal rates for either each day of sampling, or for each consecutive-day sampling event. (Average removals for the year are not acceptable.)
- ◆ Any additional sampling results pertaining to treatment plant removal efficiencies, domestic/background loadings, or in-stream pollutant levels.

- ◆ Any changes in the method of disposal of wastewater or sludge (e.g., change from land application to landfill).
- ◆ A statement that all data were gathered and analyzed using approved test methods (40 CFR Part 136 for wastewater and 40 CFR Part 503 for biosolids).
- ◆ A discussion of all data anomalies including cause and actions taken to prevent recurrence.

**Form 4** – Compare the POTW’s maximum allowable headworks loading (MAHL, lb/day), as determined by the approved local limits submission, to the highest single day treatment plant influent loading determined for the calendar year. This comparison should be performed for each pollutant for which local limits have been developed. The results can be presented in a table (preferable) or as part of the narrative described below. If this comparison reveals that the actual loading is 90% or more of the allowable loading, a detailed narrative discussing the reasons for this must be included.

In addition to the numerical comparison, a brief narrative must be provided to describe any problems encountered in the application of the approved limits, any additional pollutants of concern that may have been observed in either industrial effluent or POTW influent, and any plans to revise or augment existing limits.

All MAHL exceedances must be evaluated for pass through and results documented in Form 4. Use the following format:

- ◆ Compare the exceedance with the Water Quality (WQ) MAHL. If the WQ MAHL was not exceeded, pass through did not occur.
- ◆ If the WQ MAHL was exceeded, compare the corresponding effluent concentration with the appropriate WQ Standard. If the WQ Standard was not exceeded at the “end of pipe,” pass through did not occur.
- ◆ If the WQ Standard was exceeded at the “end of pipe,” use the following mass balance equation to evaluate for pass through:

**Form 5** – The POTW must identify all treatment plant upsets that occurred as the direct or indirect result of a non-domestic discharge. In particular the POTW must identify discharges that resulted in “pass through” or “interference,” as defined in the POTW’s ordinance. If the cause of the upset is unknown, the incident should still be listed. For each incident the POTW must identify the following:

- ◆ Date and time (where possible) of the incident.
- ◆ Description of the effect(s) on the POTW’s operation.
- ◆ Effects on the POTW’s effluent and sludge quality (including permit violations).
- ◆ Steps taken to identify the source of the discharge.
- ◆ Identity of each discharger responsible for the incident.

**Form 6** – The list of regulated users must include the following information:

- ◆ At a minimum, the list must include all Significant Industrial Users (SIUs) that discharge process wastewater to the POTW and all users subject to categorical pretreatment standards (discharging or non-discharging) that are in any way connected to the POTW.
- ◆ Any new users appearing on this list should be underlined (e.g., Metal Finishing, Inc.). Any user deleted from this list should be struck through (e.g., ~~Metal Finishing, Inc.~~). Other methods to indicate additions or deletions will be acceptable.
- ◆ Whether the user is an SIU (as defined by the POTW). Non-discharging categorical industrial users (NDCIUs) subject to zero discharge categorical standard limits are considered SIUs.
- ◆ Whether the user is subject to categorical standards (if yes, include the CFR part number applicable to the user). Only industries that have specific numerical categorical pretreatment standards and discharge process wastewater should be identified as CIUs.
- ◆ NDCIUs should also be clearly identified as such in a separate column.

- ◆ The Standard Industrial Classification (SIC) code or the North American Industry Classification System (NAICS) code.
- ◆ Whether a permit has been issued to the user.

**Form 6A** – List new non-domestic users that may potentially have a discharge to the POTW. If there are no such new users, indicate so on this form. This form is self-explanatory. Other formats that convey the same level of information are acceptable.

**Form 7** – This form is intended to summarize the compliance activities of the POTW and the industrial user for all Significant Industrial Users (SIUs).

- ◆ The first two items, SIU name and permit expiration date, are self-explanatory.
- ◆ “Number of Inspections” should reflect only complete facility inspections that are documented in the POTW’s files.
- ◆ “POTW Sampling” shall reflect the number of times the POTW monitored the industry for all regulated pollutants.

*(Note: Form 7 Instructions are Continued on Next Page)*

- ◆ “SIU Self-Monitoring” shall reflect the number of times the user monitored for all regulated pollutants. Where continuous monitoring is performed by a user (e.g., for pH), the information should not be included in the total, but may be footnoted if appropriate.
- ◆ “Significant Noncompliance”(SNC) should be reported, for each calendar quarter, using the “A, B, C, or D” coding format noted on the bottom of this form. Please refer to the EPA memo “Application and Use of the Regulatory Definition of SNC for Industrial Users” (EPA 1991) for further information regarding the application of SNC. If the POTW tracks SNC on a more frequent basis (e.g., monthly) it may report this in a similar format.

**Form 8** – This form is intended to summarize the violations of pretreatment standards and requirements for all Significant Industrial Users (SIUs) and the POTW’s response to each violation. If there were no violations identified for a user during the calendar year, the user need not be listed here. The format shown on the DEQ form is simply a suggestion. As long as the following information is provided, the format is left up to the POTW:

- ◆ Name of industrial user.
- ◆ Nature of violation. This must include procedural violations (e.g., late reports, failure to notify, etc.) as well as limits violations.
- ◆ Date of violation.
- ◆ POTW response (enforcement action).
- ◆ Date of POTW response.
- ◆ Date of return to compliance. Include the POTW's definition of "return to compliance."

**Form 9** – This form is intended to summarize the resources dedicated to the pretreatment program. Use estimates where necessary.

**Form 10** – This form is intended to provide an overview of the POTW’s performance during the past year.

- ◆ Items 1-3 are self-explanatory.
- ◆ Item 4: Include only SIUs (categorical, non-categorical and non-discharging categorical users (NDCIUs) that are subject to zero discharge categorical limits). Other Non-discharging CIUs should be included as a separate item as indicated on the form. A pretreatment delegated

Municipality is billed by the Department for the pretreatment program portion of its annual NPDES permit compliance determination fee based on the number of SIUs that were permitted or identified during any portion of the calendar year covered by the Pretreatment Annual Report. For billing purposes, the Department uses the summary information in Form 10, Item 4, to determine the number of SIUs for each Municipality.

- ◆ Items 5-15 are self-explanatory.
- ◆ Item 16: Describe QA/QC employed. For example: splits, blanks, duplicates, etc.
- ◆ Items 17-24 are self-explanatory.

*(Note: Form 10 Instructions are Continued on the Next Page)*

- ◆ Item 25: List only those actions that were taken for purposes of enforcement. Do not include phone calls and letters that were for informational purposes.
- ◆ Items 26-29 are self-explanatory.
- ◆ Item 30: This question is intended to determine which IUs have been given a compliance scheduled to meet new or revised pretreatment standards. For example, under certain circumstances, a user may be given up to 3 years to meet a newly developed categorical pretreatment standard.
- ◆ Items 31-39 are self-explanatory.

**Form 11** - This Form provides sewage treatment plant profile and technical information for each sewage treatment plant that is operated under an NPDES permit. The items are self-explanatory.

**Form 12** - This Form provides pretreatment program profile information for each Department approved program. The items are self-explanatory.

**FORM 1 - COVER SHEET**

Control Authority Name: City of St Helens ST. HELENS MUNICIPAL CODE CHAPTER 13.16

Treatment Plant Name(s) and Addresses:	DEQ / EPA (OR):	Permit Number(s) Expiration Date
City of St Helens POTW 451 Plymouth St. OR. 97051	101173	12/31/2008
	File No. 84069	
	EPA No.	
OR-002083-4		

Pretreatment Contact: Mark Gunter  
 Title: Operations / Pretreatment Coordinator  
 Address: PO Box 278  
 City, State, Zip Code: St Helens Or. 97051  
 Telephone: 503.397.2344  
 FAX: 503.366.3027  
 E-mail [markg@ci.st-helens.or.us](mailto:markg@ci.st-helens.or.us) \_\_\_\_\_

Pretreatment Coordinators: personnel for the year 2009; Aaron Kunders, Jesse Smith and Mark Gunter.

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 gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information 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.

\_\_\_\_\_  
POTW Authorized Signatory

DATE: **02.05.10**

Mark Gunter  
Pretreatment Coordinator

## FORM 2 - PROGRAM UPDATE

Approval Date of Original Pretreatment Program and date incorporated into NPDES permit:  
Schedule E of NPDES Permit # OR-002083-4 was approved signed and dated September 17, 1998.

The City of St. Helens NPDES Permit was modified September 17, 1998 to include Schedule E. Pretreatment. The permit will expire December 2008. The Plant Superintendent has submitted our application to DEQ for a new permit.

1. There are no pretreatment related materials currently being revised or developed by the City of St. Helens.
2. The City pretreatment ordinance and the local and mandated pretreatment program implementation manuals were revised to comply with the EPA Streamlining Regulation required changes and these documents were submitted at various dates during 2008 as additional revisions were made in reply to comments from DEQ.
3. The Department issued approval of the City sewer ordinance and implementation manuals that incorporated required streamlining modifications and audit specific required changes on 12/12/08.

DEQ issued a "Permit Action Letter" dated 12/18/08, approving the City sewer use ordinance and implementation manuals, as revised to meet required streamlining modifications, and incorporating the revised St. Helens pretreatment program into the City NPDES permit.

The following is noteworthy and involves the Pretreatment Activities/Accomplishments and the improvements to enhance the operation of the City of St. Helens POTW:

- A. Our Significant Industrial Users continue to reduce or eliminate their hydrogen sulfide discharge limits.

**Armstrong World Industries** an international ceiling tile manufacturer is monitored using our Mandated Pretreatment Program for Significant Industrial User. The industrial process used at Armstrong can support development of high levels of dissolved sulfide in their process wastewater discharge. The City had worked diligently with Armstrong to develop adequate sulfide control in their process wastewater system and specific permit requirements were implemented. Although site-specific limits and controls were implemented the levels of sulfide were found to increase significantly as the wastewater was pumped from the industrial site through a long dedicated force main. The City worked with Armstrong to develop a procedure to control sulfide levels in the force main as well in the facility wastewater process system. The DEQ approved industrial user permit has been modified to incorporate sulfide limits in the Armstrong force main. The revised industrial user permit provides necessary limits for sulfide concentration and requires the use of "Best Management Practices" to be followed by Armstrong staff to control conditions that may cause excessive sulfide concentrations. The permit protects the City POTW while allowing the user flexibility in the control mechanisms they use to control sulfide within the permit limits. Armstrong has been in compliance for 2009.

The **Boise Building Solutions** shut down their process on September 11<sup>th</sup> 2008 and transferred to Medford Oregon. The Boise Corporation decided to mothball the facility to be inactive until such time the facility is restarted. December 2009 Boise Building Solutions requested and received a Reissuance of permit, and they will notify us upon reopening operation of the facility. The permit expires May 1<sup>st</sup> 2015.

- B. The City pretreatment program was audited by DEQ in 2008. All required audit actions were completed and submitted to the Department.
  
- C. The City completed revisions of the sewer use ordinance and implementation manuals to incorporate all “required EPA Sreamlining” modifications with DEQ approval of the program changes received on 12/12/08/.

## LAGOON OVERVIEW (Fig. 1)



### FORM 3 - TREATMENT PLANT MONITORING

Provide all treatment plant influent, effluent and biosolids (sludge) data for toxic pollutants and non-conventional pollutants collected during the calendar year. Discuss all data anomalies including cause and actions taken to prevent recurrence. Include all resampling results for samples taken to meet NPDES permit-monitoring requirements as a result of monitoring that was invalidated for any reason. (See *Instructions for completing FORM 3*)

The City NPDES permit requires analysis for the specific toxic pollutants listed in 40 CFR 122.22 Appendix D Tables II & III quarterly (*AOX is daily*). Letter from DEQ Dated April 13, 2009 stated;” with the recent shutdown of the pulping and bleaching operations at the Boise mill in St. Helens, the Department of Environmental Quality feels that it is no longer necessary to regularly monitor AOX and 2,3,7,8-TCDD (dioxin) at out fall 001” (*daily*). The mill specific pollutants MW (Heat/Thermal Discharge) and Turbidity are monitored daily for MW and Turbidity and quarterly for TCDD and AOX. Other analytes we monitor are the Heavy Metals, Organic Toxic Pollutants, Chloroform and Total Cyanide and Phenols. Oil and Grease and TDS are analyzed voluntarily and are not required by the permit. All analytical results were within expected ranges.

Bioassay Testing is required on a quarterly basis. In 2009 all test result were within permit allowed limits for both acute and chronic toxicity testing based, on reproduction, growth and survival of the designated species. These species are the fathead minnow (*Pimephales promelas*), the water flea (*Ceriodaphnia Dubia*), and green algae (*Raphidocelis subcapitata*). These species are all required in the Joint NPDES Permit.

All the required influent, effluent, and sludge monitoring data for 2008 is attached in Appendix #1 and #2 Secondary lagoon solids test results are in Appendix #3.

In summary all required monitoring was completed and all test were within expected ranges and within permit limits.

### FORM 4 - HEADWORKS LOADING COMPARISON

We do not have a MAHL nor do we have Local Limits. DEQ and the Pretreatment staff determined there was no reasonable need to develop Local Limits results because of the large dilution available in the secondary lagoon with typical flows from the Boise mill in the 6 MGD range with the City averaging <3 MGD annually. The secondary Lagoon design volume is *217 Million Gallons*. A restructuring of the Boise pulp and paper mill was announced in November 2008, and has taken place in 2009 to include the shutting of down processes of pulping and bleaching as well as the shutting down of two of the four paper machines. The concentrations were so miniscule they were difficult to discern. Although the City program

does not currently provide specific local limits all our Industrial Users are evaluated for potential impact to ensure we continue to meet water quality standards.

## FORM 5 - TREATMENT PLANT UPSETS/PROBLEMS

Provide a description of each instance of treatment plant upset due in whole or in part to a non-domestic discharge. (See *Instructions for completing FORM 5*)

– The POTW must identify all treatment plant upsets that occurred as the direct or indirect result of a non-domestic discharge. In particular the POTW must identify discharges that resulted in “pass through” or “interference,” as defined in the POTW’s ordinance. If the cause of the upset is unknown, the incident should still be listed. For each incident the POTW must identify the following:

- ◆ Date and time (where possible) of the incident.
- ◆ Description of the effect(s) on the POTW’s operation.
- ◆ Effects on the POTW’s effluent and sludge quality (including permit violations).
- ◆ Steps taken to identify the source of the discharge.
- ◆ Identity of each discharger responsible for the incident.

The City of St. Helens – Boise White Paper LLC upset report

A Bunker Fuel Oil Spill occurred at Boise White Paper LLC on Sunday March 4<sup>th</sup> 2007. The fuel leaked from a seal on a boiler supply pump. The operator stopped the leak by isolating the pump and cleanup procedures using oil absorbent materials. City of St. Helens WWTP operator informed the Superintendent of the black oily sheen on the ASB. The mill staff activated their Oil Spill Prevention , Control, and Countermeasures (SPCC) The National Response Procedures and the Oregon State Emergency Response System was notified. Clean River Cooperative and Cowlitz Clean Sweep a cleanup contractor was also contacted. Oil absorbent booms were installed as well as snare material and vacuum trucks. The estimated leak was 100 gallons. The Boise Paper LLC is not reviewed under the Pretreatment Program and is under the jurisdiction of DEQ. This incident did not cause any violations. The incident was reported to DEQ March 8<sup>th</sup> 2007 in detail.

**Form 6** – The list of regulated users must include the following information:



**FORM 6A - INDUSTRIAL SURVEY UPDATE**

Name of Industry	Survey Returned (Y/N)	Permit Application Required (Y/N)	Permit Application Returned (Y/N)	Permit Issued (Y/N)	Comments
Armstrong World Industries	Y	Y	Y	Y	Permit #101, Renewed July 15 <sup>th</sup> 2005-2010
					The permit includes sulfide limits of Daily Max
					≤0.50 ppm and a Monthly Avg. of 0.25 ppm
Boise Building Solutions	Y	Y	Y	Y	Permit #102, Renewed May 1 <sup>st</sup> 2005-2010
(Boise Veneer is currently inactive, their permit will expire May 1, 2010)					Modified the permit to include sulfide limits
					Parameter Max of. ≤0.50 ppm

**FORM 7 - COMPLIANCE/OVERSIGHT SUMMARY**

(SIUs ONLY)

Name of SIU	Permit Expiration Date	Number of Documented Inspections	POTW Sampling (All Regulated Pollutants)	SIU Self-Monitoring (All Regulated Pollutants)	SNC for Quarter			
					1	2	3	4
Armstrong World Industries	07.15.2010	1	Sampled 2X, All Regulated Pollutants	12	0	0	0	0
Boise Building Solutions	05.01.2010	1	Sampled 2X, All Regulated Pollutants	12	0	0	0	0
(Boise Veneer is currently inactive, their permit will expire May 1, 2010)			Regulated Pollutants					

**FORM 8 - NONCOMPLIANCE/ENFORCEMENT SUMMARY  
(SIUs ONLY)**

<b>Name of SIU</b>	<b>Nature of Violation</b>	<b>Date of Violation</b>	<b>POTW Enforcement Response</b>	<b>Date of POTW Response</b>	<b>Date of Return to Compliance</b>	<b>Comments</b>
Armstrong World Industries	NONE	N/A	N/A	N/A	N/A	
Boise Building Solutions	NONE	N/A	N/A	N/A	N/A	

1. The Slug Control Plan and Flow Schematic were found to be deficient in a DEQ audit of the City Pretreatment Program conducted September 2007 and concluding January 2008. The deficiencies were corrected with changes approved by DEQ. The City revised the Armstrong Industrial User permit to include requirements for sulfide control in the force main from the industry pumping station as well as additional slug discharge plan requirements.
2. Inactive Boise facility has resulted in no testing needed.

### FORM 9 - RESOURCE SUMMARY

Item	Previous Year	Planned	Comments
<b>Labor (man-hours)</b>			
Sampling	170	170	
Inspection	100	150	
Management	550	550	
Administration	750	750	
Laboratory	50	50	
Enforcement	100	100	
<b>TOTAL HOURS</b>	<b><u>1720</u></b>	<b><u>1720</u></b>	
<b>Operating Cost</b>			Pretreatment does not have a
Laboratory	\$100	\$100	Separate budget. Operating
Sampling and Inspection	\$5,700	\$5,700	expense is paid from Sewer –funds.
Permit Writing	2100	\$2100	
Enforcement	\$1000	\$1000	
<b>TOTAL COSTS (\$)</b>	<b><u>\$9800</u></b>	<b><u>\$9800</u></b>	
<b>Income Revenue</b>			
Sewer Use	\$1,761,880	\$1,841,165	
Extra Strength (Secondary Rev.)	\$3,090,007	\$2,391,502	
Impervious Area	\$0.00	\$0.00	
Penalties	\$0.00	\$0.00	
<b>TOTAL INCOME (\$)</b>	<b><u>\$4,851,887</u></b>	<b><u>\$4,232,667</u></b>	

## FORM 10 - PRETREATMENT PROGRAM EVALUATION

1. Has a change in contributing jurisdictions occurred since the last Annual Report?

- **No**

If yes, identify the jurisdictions that have been added or removed: \_\_\_\_\_

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2. Has the Control Authority updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [(403.8(f)(2)(i)]

- **Yes**

**Business license applications and renewals and building permits are reviewed on a monthly and annual basis using the following procedure.**

As an on-going procedure to maintain this list, the City will use a Non-Domestic Environmental Screening Survey (NDESSF) Form to identify potential SIUS. Industries that may qualify as an SIU are issued an Environmental Survey Form with an Application to determine significant industrial user status and potential impact. In addition to the Environmental Screening Form there is also a schematic matrix that guides us through the rest of the process.

When individuals apply for licenses or construction to house a non-domestic concern we insert the screening questionnaire in their packet. Then when their applications are completed along with the Non-Domestic Environmental Forms they are submitted along with the monthly list of the City's Business and Planning Departments most recent Business License Applications and proposed construction for the year. These new business and construction applications for non-domestic users of the sanitary sewer system are submitted to the Operations/Plant Supervisor. Once he receives this information, he completes a NDESSF based on the information submitted by the user. He then makes a determination whether additional information is required. If further review of the discharger's waste is not necessary, the user will be logged accordingly otherwise if the industry has potential to adversely impact the POTW it will be evaluated and classified under the mandated Pretreatment Program. This Mandated Pretreatment program not only reviews for SIU's but also CIU's.

2. If yes:

a. Are any of these SIUs located in new service areas (describe)?

- **No**

b. Have any SIUs located in contributing jurisdictions where the POTW has no inter-jurisdictional agreements or IU contracts?

- **No**

c. If yes, specify:

3. For any new Categorical Industrial Users or processes identified during the Report period:

a. Baseline Monitoring Report (BMR) Submitted?

1. **No new categoricals**

b. Final (90-day) Compliance Report (FCR) Submitted?

2. N/A
4. How many SIUs were permitted or identified by the Control Authority in each of the following categories at any time during the Report period?

**2** TOTAL SIUs (as defined by Control Authority) [WENDB-SUIS]

**2** Significant Non-categorical IUs

**0** NDCIUs subject to zero discharge limits

Other regulated non-categorical IUs (Describe): Local Program

- **Pacific Stainless Products** this facility has no process discharge only sanitary approximately 400 gallons per day. Their stainless fixtures fabrication has no drains in the fabrication area. The City of St. Helens Local Program after reviewing their Environmental Survey Form and visiting the facility authorized their operation January 18<sup>th</sup> 2007
- **Boise Landfill Permit # 110** The Landfill is covered in a storage mood and is not being used at this time. Storm water run off is still monitored monthly for pH, flow and BOD. Annually it is checked for TCDD TCDF and Total Phenols. Annual results have consistently been at acceptable levels. Mill generated solids are being used for Beneficial Use.

• **Columbia County Transfer Station.** Relocating their new facility located at 36525 Railroad Avenue St. Helens OR .

• **Septage Haulers** licensed by DEQ and permitted by the POTW Pretreatment program are not allowed to discharge any hazardous waste or waste from any categorical industry.

NDCIU's that are not subject to zero discharge limits.

**0**

5. Is the Control Authority's definition of "Significant Industrial User" the same as EPA's? [403.3(t)(1)(i-ii)]

**Yes** However the streamline CFR [403.3(t)(1)(i-ii)] is outdated and is changed to 403.3(v)(i-ii). The Control Authority now meets EPA's "Significant Industrial User" definition

6. If not, the Control Authority has defined "Significant Industrial User" to mean:

N/A

6. How many SIUs are required to be covered by an individual control mechanism?

• **2.**

How many SIUs are not covered by an existing, unexpired permit or other control mechanism? [WENDB-NOCM ]

• **0**

Explain: **The City of St. Helens has identified two SIUs, all are currently permitted**

7. Were individual control mechanisms issued/reissued for 90% of the SIUs within 180 days of the expiration date? [RNC] [WENDB]

• **Yes**

How many control mechanisms were not issued within 180 days of the expiration date? .

- 0

8. Does the Control Authority have a control mechanism for regulating IUs whose wastes are trucked to the treatment plant?

- Yes

If yes, does control mechanism designate a discharge point?

- Yes

9. Are all applicable categorical standards and local limits applied to IUs whose wastes are trucked into the POTW?

- Yes

All hauled waste requires a manifest indicating source. Spot checks are conducted for sampling and pH of all non-domestic sources. We have determined the loading impacts of Septage hauling when compared to our incoming collections loading is less than 5%.

10. Has the Control Authority evaluated the need for SIUs to develop slug discharge control plans? [403.8(f)(2)(v)]

- Yes

-

If yes, when was the evaluation last conducted and what criteria were used to identify the IUs for slug plans?

- Slug discharge plans are reviewed at each annual inspection with the industry.

How many slug control plans were:	Required?	<u>2</u>
	Received?	<u>2</u>
	Approved?	<u>2</u>

The two slug control plans were revised and submitted January 2008.

11. Are TTO standards or alternatives (solvent management plans or oil & grease monitoring) being implemented for IUs subject to TTO limitations?

- N/A

If not why?

- No industries in St. Helens require such a plan.

Are TTO standards being applied to other IUs?

- N/A

12. How many times were the following monitored during the past year?

Parameters	Pri. Inf.	Pri. Eff.	Boise Eff.	Sec. Eff.	Sludge Pri.	Sludge Sec.	Ambient (Intake Water)
Metals	4	4	4	4	0	0	0
Priority Poll.	4	4	4	4	0	0	0
Biomonitoring	0	0	0	4	0	0	0
TCLP	0	0	0	0	0	1	0
EP Tox	0	0	0	0	0	0	0
AOX	4	4	4	108	0	0	0
2,3,7,8 TCDD/TCDF	0	0	0	4	0	0	0

13. How many, and what percentage of SIUs were (a) not sampled at least twice, or (b) not inspected at least once during the reporting period? [WENDB-NOIN]-[403.8(f)(2)(vi)]

- a. Number and % not sampled      **0**      **(0%)**  
 b. Number and % not inspected:      **0**      **(0%)**

14. Does the Control Authority routinely split samples with industrial personnel?

- a. If requested:  
     • **Yes**  
 b. To verify SIU self-monitoring results:  
     • **Yes**

15. Provide the following analytical information regarding pollutant analyses:

Parameters	Analytical Method	Name of Laboratory
<b>Metals</b>	<b>EPA 200.7(ICP) EPA 200.8 (ICP/MS) STD METH 3113B GF/AA</b>	<b>Portland Environmental Services</b>
<b>Cyanide</b>	<b>EPA 335.2</b>	<b>Portland Environmental Services</b>
<b>Organics</b>	<b>EPA 624/625/608</b>	<b>Portland Environmental Services</b>

Other:	AOX 1650B EPA 600/4-90/027 TCDD/TCDF 1613A	Columbia Analytical Services CH <sub>2</sub> MHILL Vista Analytical Laboratory
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16. Does the Control Authority use QA/QC for sampling and analysis?

- Yes

If yes, describe:

- Contract laboratories are required to participate in the annual EPA DMR OC Program to demonstrate acceptable laboratory performance. Use of additional commercially available OC standards submitted to contract laboratories for analysis to verify adequate performance is considered when appropriate.
- The City Laboratory participates in the annual EPA DMR OC Program and in addition, participates in the quarterly West Coast NCASI NPDES QA Program. Both programs provide blind samples or standards to be analyzed for conventional pollutants. If results are not within acceptable limits, typically the 95% confidence level limits, the data will be evaluated to determine the appropriate corrective action. Additional standards should be analyzed to confirm corrective action effectiveness.

17. How much time normally elapses between sample collection and obtaining analytical results

- Normally 10 – 15 working days for contract services.

18. Is there an established protocol clearly detailing sampling location and procedures?

- Yes
- The POTW O & M Manual and the Pretreatment Operational Guide give clear direction for sampling protocol and procedures.

19. Has the Control Authority had any problems performing compliance monitoring?

Scheduled No                      Unscheduled: No                      Demand: No

If yes, explain:

- N/A

20. How frequently does the Control Authority use the closed cup flashpoint test, specified in 40 CFR Part 261.21, to monitor SIUs? [403.5(b)(1)]

Once per year

Prior to each sampling

Other:

- If a flashpoint test is required, the generator is responsible for analysis, the Control Authority has not yet required this test.

Did the Control Authority find any problems?

- No

If yes, explain:

21. Does the Control Authority compare all monitoring data to applicable pretreatment standards and requirements contained in the control mechanism within 15 days of its receipt? [403.8(f)(2)(iv)]
  - **Yes**
22. Does the Control Authority use EPA's definition of Significant Noncompliance (SNC)? [403.8(f)(2)(vii)]
  - **Yes**
23. Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to submit additional monitoring within 30 days after the violation is identified [403.12(g)(2)]
  - **Yes**

If the Control Authority conducts monitoring in lieu of the user, does the Control Authority resample and obtain results within 30 days of identifying a violation?

- **Yes**
24. Has the Control Authority developed an Enforcement Response Plan?
    - **Yes An Enforcement Matrix has been developed and approved by DEQ and EPA.**
  25. For each of the listed enforcement actions, identify the following for the ones the Control Authority has used during the reporting period: [WENDB-JUDI; FENF]

	Total # of Actions	# of Industries Affected
Written notice or letter of violation	0	0
Administrative orders	0	0
Administrative fines	0	0
Show cause hearings	0	0
Compliance orders	0	0
Permit revocation	0	0
Civil action	0	0
Criminal action	0	0
Termination of service	0	0
Other (specify): <b>Phone Call</b>	0	1
Compliance Meeting	2	1

26. Indicate the number and percent of SIUs that were identified as being in SNC (as defined by EPA) with the following during the reporting period: ***Our present Ordinance No 2945 is consistent with the old definition of SNC not the new Streamlining one which is in the process of submittal January 2008.***

		# of SNC SIUs	% of SNC SIUs
Applicable pretreatment standards	[PSNC]*	0	0%
Self-monitoring requirements	[MSNC]	0	0%
Reporting requirements	[PSNC]*	0	0%
Pretreatment compliance schedule	[SSNC]	0	0%
Other:		0	0%

27. Did the Control Authority publish all SIUs in SNC in the largest daily newspaper?  
[WENDB-SVPU] [403.8(f)(2)(vii)]

- N/A

If yes, attach copy, or attach copy of affidavit of publication.

28. Indicate the number of SIUs that are currently in SNC with self-monitoring and were not inspected or sampled: [WENDB-SNIN]

- None

29. Has the Control Authority experienced any of the following?

	Yes	No	Unknown	Explain:
Interference [WENDB]*		<input checked="" type="checkbox"/>		
Pass through [WENDB]*		<input checked="" type="checkbox"/>		
Fire or explosions (including flash point violations)		<input checked="" type="checkbox"/>		
Corrosive structural damage (including pH<5.0)		<input checked="" type="checkbox"/>		

Flow obstructions		<u>X</u>		
Excessive flow or pollutant concentrations		<u>X</u>		
Heat problems		<u>X</u>		
Interference due to oil or grease		<u>X</u>		
Toxic fumes		<u>X</u>		
Illicit dumping of hauled waste		<u>X</u>		

30. How many SIUs are currently on compliance schedules in order to meet new or revised national pretreatment standards or requirements?

- **None**

Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance? [403.6(b)]

- **N/A**

31. Indicate the number of SIUs from which penalties have been collected by the Control Authority during the past year:

	Number	Amount (\$)
Civil	0	\$ 0.00
Administrative	0	\$ 0.00
<b>Total</b>	0	\$0.00

32. Have IUs requested that data be held confidential?

- **No**

33. Have any requests been made by the public to review files?

- **No requests.**
- Has public comment been solicited during revisions to the SUO and/or local limits since the last PCI or audit? [403.5(c)(3)]
- **No**

35. Are there significant public or community issues impacting the POTW's Pretreatment program?

- **No**

36. Are all records maintained for at least 3 years?

- **Yes**

37. Have any problems in program implementation been observed which appear to be related to inadequate funding, resources or staff?

- **No**

If yes, explain:

38. Does the Control Authority have the technical documents necessary for implementing its pretreatment program?

- **Yes**

39. Does the Control Authority have access to adequate:

	Yes	No	Explain:
Sampling equipment	<b><u>X</u></b>		
Safety equipment	<b><u>X</u></b>		

Vehicles	<u>X</u>		
Analytical equipment:	<u>X</u>		

# FORM 11 - SEWAGE TREATMENT PLANT PROFILE(S)

Complete This Section for Each Sewage Treatment Plant  
Operated Under an NPDES Permit

DEQ NPDES Permit Number **101173**

1. Treatment Plant Design Dry Weather Flow (MGD) **PRI 2.29 DDWF SEC 38 DDWF**
2. Treatment Plant Actual Dry Weather Flow (Ave.) (MGD) **PRI 1.33 ADWF SEC 7.34ADWF**
3. Treatment Plant Design Wet Weather Flow (MGD) **PRI 11.88 AWWF SEC 43 AWWF**
4. Treatment Plant Actual Peak Wet Weather Flow (MGD) **PRI 20.89 SEC 40.29**

5. Sewerage System

- a. Separate (%) **100%**
- b. Combined (%)
- c. Number of CSOs

6. Industrial Contribution

- a. Flow (MGD) **2007 AVG. 7.5**
- b. % of Influent **AVG 2.02 MGD OF WHICH .197 MGD IS SIUs @~10.00%**
- c. Number of contributing SIUs (non-CIUs). **1**  
Number of contributing CIUs **0**

7. Level of Treatment and Description

- a. Preliminary **Headworks Screen**
- b. Primary **ASB -- 7.1 MG 280 Hp Aeration**
- c. Secondary **ASB -- 214 MG 2275 Hp Aeration**
- d. Tertiary **N/A**
- e. Type of Disinfection **Hypo chlorite to Primary Effluent System**

8. Receiving Water

- a. Name **Columbia River**
- b. Classification (NPDES Permit Hydro Code) **10--COLU 86 . 9 D**
- c. Designated Beneficial Uses (OAR 340-41 Basin Standards.)  
**See OAR**  
**340-41**

9. Effluent Discharged to Any Location Other than Receiving Water? Yes      **No**

If yes, Indicate Where, When, and Describe \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

10. Indicated Methods of Biosolids (Sludge) Disposal (Mg/Kg (dry weight) / year)

- a. Land Application
- b. Municipal Solid Waste Landfill **2009-3600 Dry Tons** \_\_\_\_\_
- c. Sale or Donation to Public \_\_\_\_\_
- d. Other (Specify) \_\_\_\_\_

1. Information Pertaining to Contributing Jurisdictions (**Complete for Each Jurisdiction**)

a. Name of Contributing Jurisdiction **Columbia City**  
DEQ Approved IJA or IGA  **Yes**  No  
Date Approved by DEQ **Approved as part of Pretreatment Program 9-4-98**  
Date Incorporated into NPDES Permit **Pretreatment Program 9-4-98**  
Number of CIUs in Contributing Jurisdiction **None**  
Number of other SIUs in Contributing Jurisdiction **None**

b. Name of Contributing Jurisdiction \_\_\_\_\_  
DEQ Approved IJA or IGA  Yes  No  
Date Approved by DEQ \_\_\_\_\_  
Date Incorporated into NPDES Permit \_\_\_\_\_  
Number of CIUs in Contributing Jurisdiction \_\_\_\_\_  
Number of other SIUs in Contributing Jurisdiction \_\_\_\_\_

c. If Relying on Contributing Jurisdictions, Indicate, **for Each**, Which Activities they are Required to Perform:

Name **Columbia City**

Industrial Waste Survey (IWS)  
Permit Issuance  
Inspection  
Sampling  
Enforcement  
Notification of Industrial Users (IUs) of Pretreatment Requirements  
Receipt and Review of IU Reports  
Analysis of Samples  
Other (Specify)

Name \_\_\_\_\_

Industrial Waste Survey (IWS)  
Permit Issuance  
Inspection  
Sampling  
Enforcement  
Notification of Industrial Users (IUs) of Pretreatment Requirements  
Receipt and Review of IU Reports  
Analysis of Samples  
Other (Specify)

Name \_\_\_\_\_

Industrial Waste Survey (IWS)  
Permit Issuance  
Inspection  
Sampling  
Enforcement  
Notification of Industrial Users (IUs) of Pretreatment Requirements  
Receipt and Review of IU Reports  
Analysis of Samples  
Other (Specify)

2. Indicate Approved Pretreatment Program Compliance and Inspection Frequency Requirements

a. Inspections

- (1) CIUs one per year
- (2) Other SIUs **One per year**
- b. Sampling by Control Authority (i.e., the Municipality or POTW)
  - (1) CIUs
  - (2) Other SIUs **POTW 2X**
- c. Industrial User (IU) Self-monitoring
  - (1) CIUs
  - (2) Other SIUs **Daily, monthly and sometimes quarterly**
- d. Reporting by IUs
  - (1) CIUs
  - (2) Other SIUs **MONTHLY by the 10<sup>th</sup> of the following month**

3. Indicate the Compliance/Enforcement Options that are Available in the Event of IU Noncompliance

- Notice of Violation or Letter of Violation
- Compliance Schedule
- Injunctive Relief
- Imprisonment
- Termination of Service
- Administrative Order
- Revocation of Permit
- Fines (Maximum Amount)
  - a. Civil **\$1000.00/day/violation**
  - b. Criminal **\$1000.00/day/violation**
  - c. Administrative **\$1000.00/day/violation**

4. Is any part of the Pretreatment Program being Operated under any Pretreatment-related Consent Decree, Administrative Order, Compliance Schedule, or other Enforcement Action?      Yes              No

If Yes, Explain \_\_\_\_\_  
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5. **List Effluent and Sludge Quality (Needed for National Pretreatment Award Eligibility Assessment)**

**List NPDES Permit effluent and biosolids limits violated and suspected causes**

<b>Parameters Violated/Date</b>	<b>Cause(s)</b>
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NONE

6. Have Treatment Plant Biosolids Violated any TCLP tests? Yes No

We have performed the TCLP 2 to 3 times and always passed. \_\_\_\_\_

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*Appendix Listing*

APPENDIX #1	Quarterly Metals
APPENDIX #2 Spreadsheets	Plant Performance
APPENDIX #3 Data	Secondary Solids Toxicity

## APPENDIX #1

# Quarterly Metals

## APPENDIX # 2

### Plant Performance Spreadsheets

## APPENDIX #3

### Secondary Solids Toxicity Data