



WASHINGTON STATE
DEPARTMENT OF
E C O L O G Y

Discharge Limit Violations and Compliance Report

Water Quality Permitted Facilities

**For the Period
January 1, 1999 through December 31, 1999**

**January 2001
Publication Number 01-10-005**



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Prepared by:
Washington State Department of Ecology
Water Quality Program

For more information, please contact
Stephen Bernath
(360) 407-6459
Email: sber461@ecy.wa.gov

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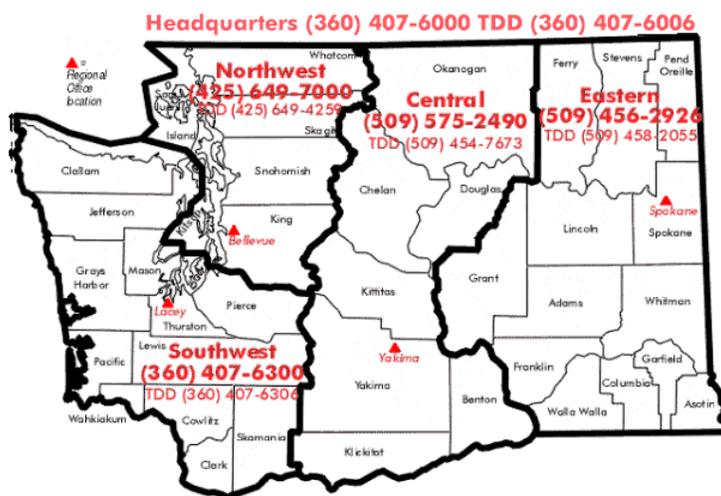


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Introduction

This is the first of a renewed series of reports by the Washington Department of Ecology regarding enforcement and compliance activities for water quality. Ecology plans to produce a compliance report annually. This report covers the 1999 calendar year. Not all compliance activities are reported, so this report is limited to what was readily available. The year 2000 report will be more complete and address more of the recommendations suggested by the Enforcement Subcommittee of the Water Quality Partnership (see Appendix A for the draft outline).

Overview

The majority of Ecology's compliance and enforcement activities for water quality occur through its regional and field offices. They are located in Bellevue, Lacey, Spokane, Yakima, Bellingham, and Vancouver.

Specialists at Ecology's headquarters and the Hanford office are responsible for overseeing water permitted functions at very large facilities, such as pulp and paper mills, oil and aluminum refineries, and the Hanford nuclear facilities. Although these specialists are not from within the Water Quality Program, the water quality compliance activities are included in this report.

Ecology requires municipal and industrial facilities to provide monthly information in the form of a Discharge Monitoring Report (DMR). Permits are written specifically for the facility, its location, and the type of discharge. Municipal facilities tend to have many more parameters and process controls to report than industrial facilities. General permits are issued to categories of facilities with similar discharges and operational requirements.

Compliance activities include inspection and technical assistance. Informal enforcement actions include letters, phone calls, and Notices of Correction. Formal enforcement tools include Notices of Violation, Administrative Orders, and Civil Penalties. Ecology generally uses the appropriate level of enforcement to gain compliance. Ecology sets compliance and enforcement priorities based on risk to public health, environmental harm, and available resources.

Ecology provides technical assistance for municipal wastewater facilities through two technical assistance specialists working across the state.

Ecology issues monthly warning letters or calls facilities whose DMRs indicate that there may be a compliance issue.

Inspections of facilities are done on an annual basis. Other inspections are done when monitoring reports show compliance problems or a complaint indicates a need.

Nonpoint Pollution

Nonpoint pollution is the accumulation of sediment, chemicals, toxics, nutrients, debris, and pathogens that get washed into the nearest body of water by runoff from rainstorms, snow melt, or human practices. The source of nonpoint pollution is generally from water-based and land-use activities, surface water runoff from agricultural lands, urban areas, and forest lands.

Nonpoint compliance is accomplished through inspections, as well as complaint responses, technical assistance, and public education. The same administrative tools such as Notices of Correction, Administrative Orders, and Civil Penalties that apply to point sources are used for nonpoint sources. Specialists in forest practices, dairy management, agriculture, and construction and urban stormwater also conduct technical assistance as well as compliance and enforcement activities.

Point Source Pollution

Point source pollution typically comes out of a pipe from industrial and municipal wastewater treatment plants or is pollution that can be easily identified as coming from a specific source.

The graphs starting on page 3 are based on permitted municipal and industrial facilities and their DMR data.

When Reviewing This Report Remember

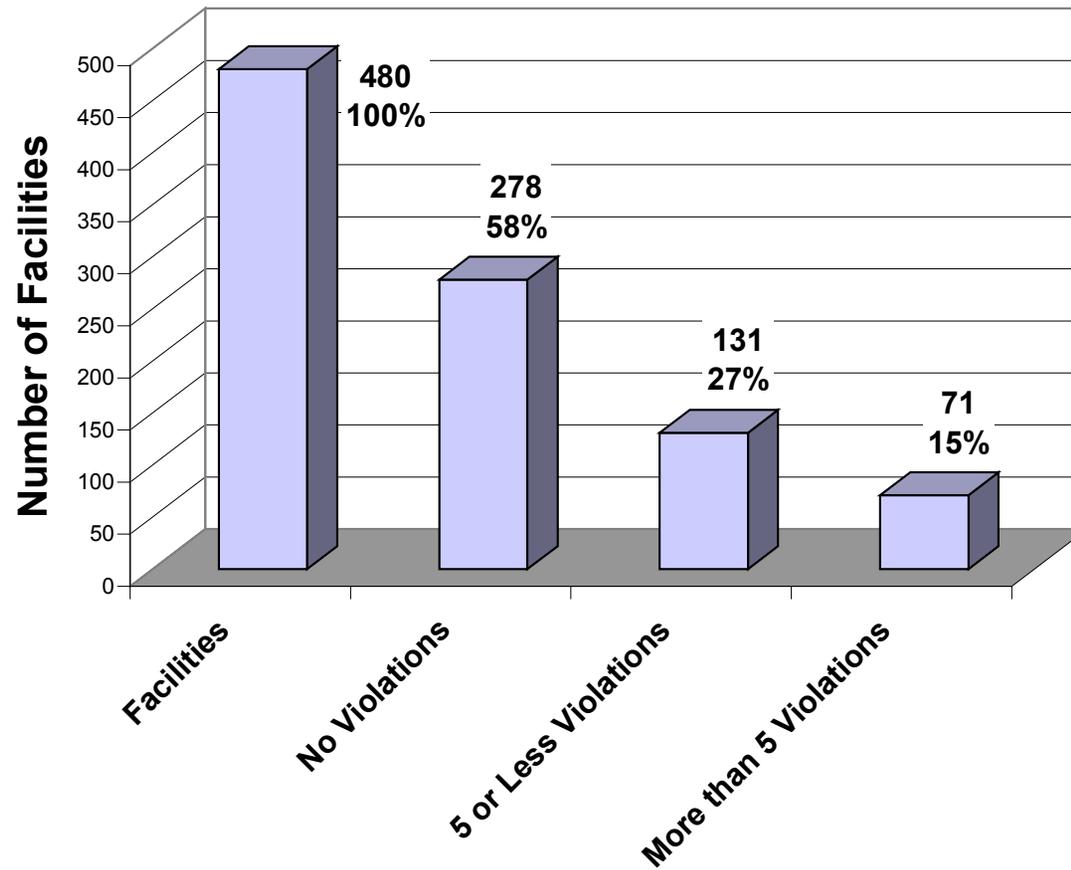
This is only an indicator of compliance. These statistics do not include other non-parameter violations that may have occurred due to permit conditions or Best Management Practices requirements associated with the Water Pollution Control Act.

The following graphs are based on permitted municipal and industrial facilities. The basic statistics illustrating facility compliance for this report is as follows:

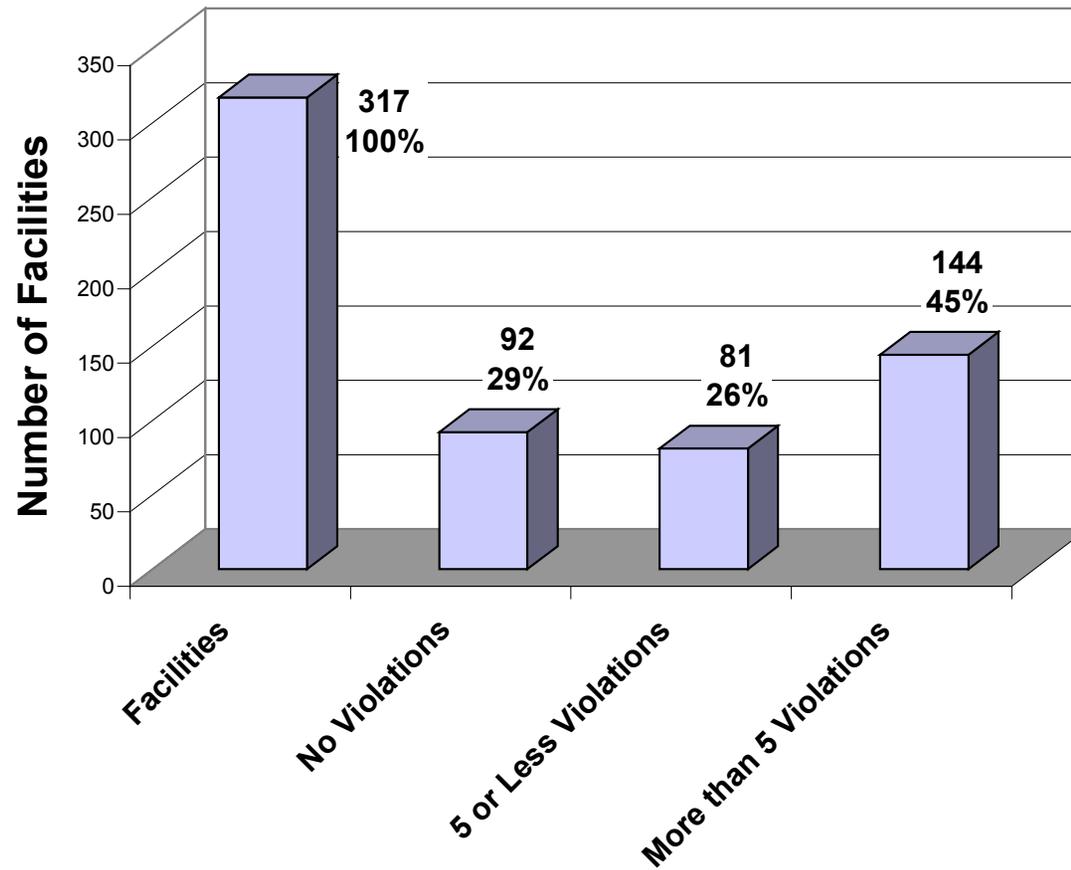
- The number of industrial and municipal facilities with individual permits.
- The number of industrial and municipal facilities with no violations based on DMRs.
- The number of industrial and municipal facilities with less than five parameter violations.
- The number of industrial and municipal facilities with greater than five parameter violations.
- The number of industrial and municipal facilities with greater than five parameter violations and what action may have been taken.
- The number of reported parameters for municipal and industrial facilities.
- The number of reported parameters for municipal and industrial facilities that exceeded less than 20 percent of a parameter limit.
- The number of reported parameters for municipal and industrial facilities that exceeded greater than 20 percent of the parameter limit.
- The number of facilities covered by a general permit by type.

Graphs

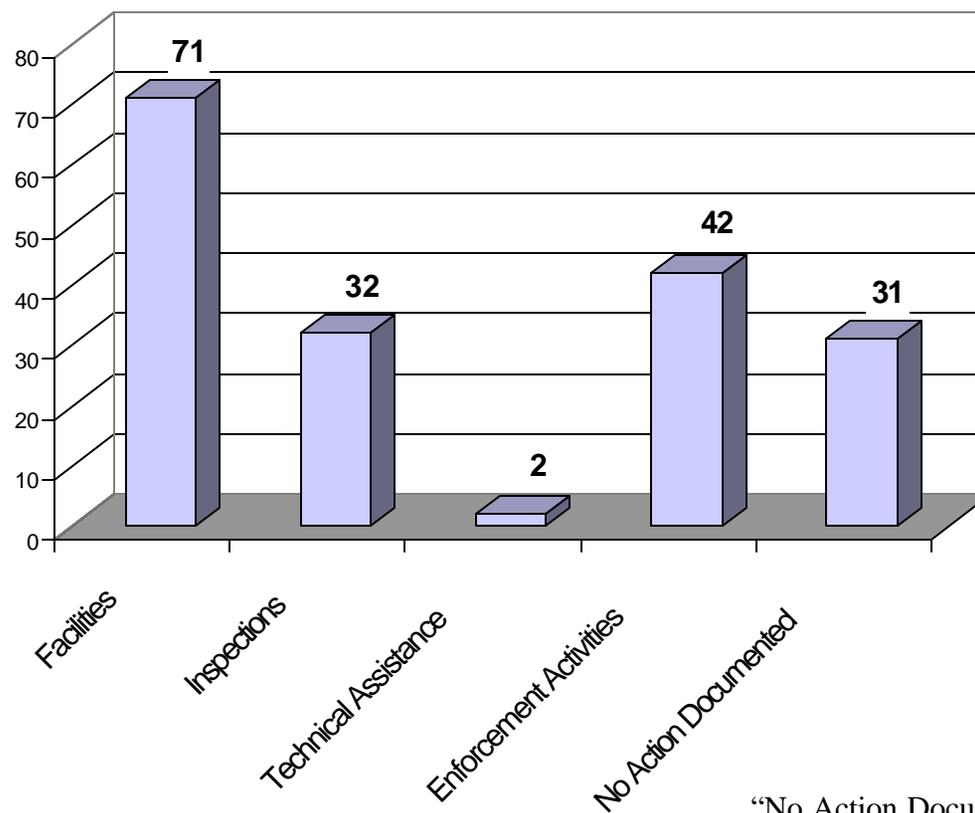
1999 Industrial Facilities



1999 Municipal Facilities

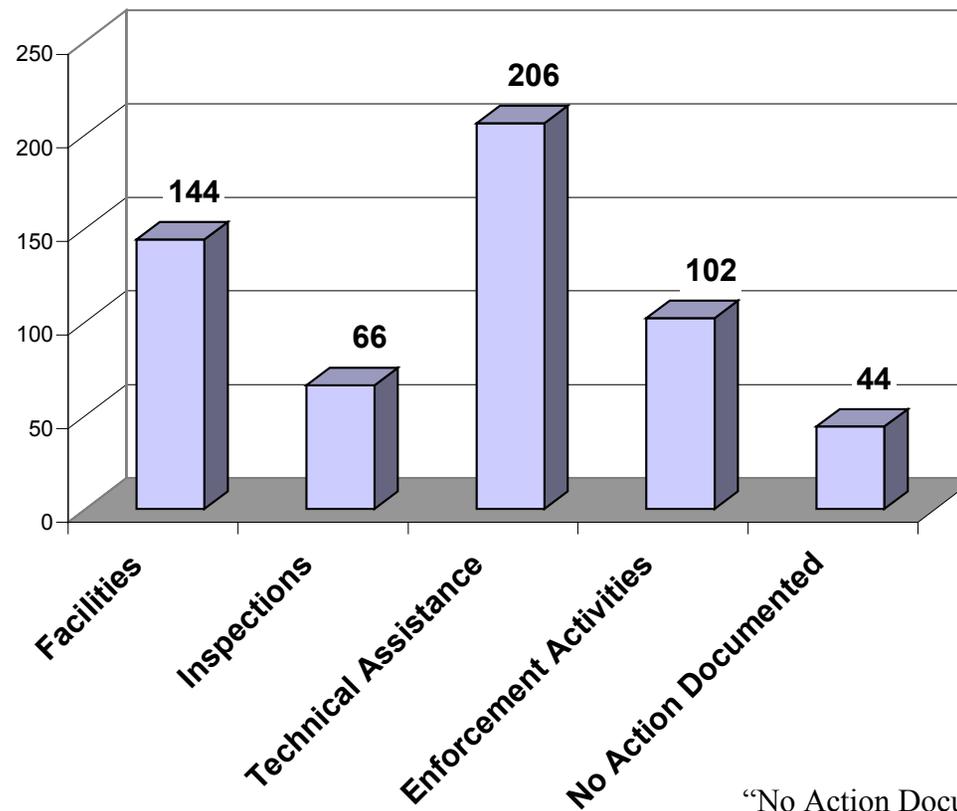


1999 Industrial Facilities with Greater than Five Reported Violations



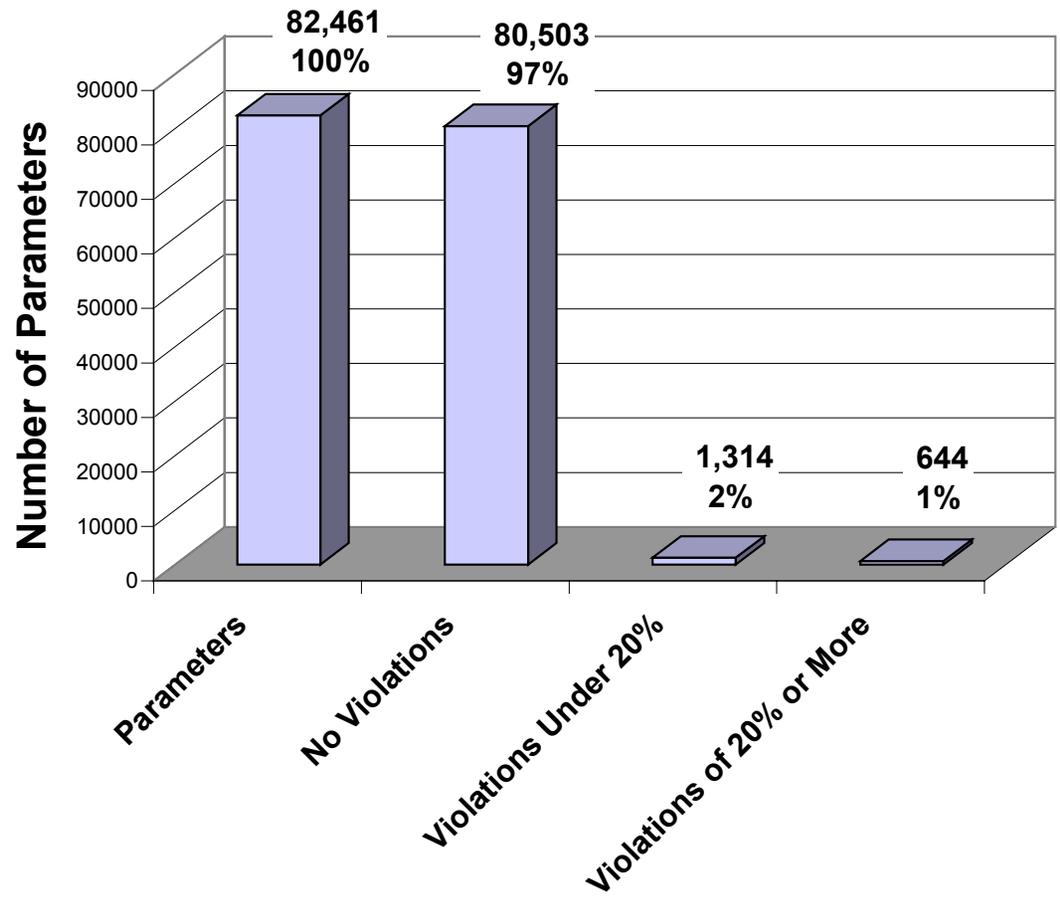
“No Action Documented” means no formal enforcement was taken, such as an order, etc.

1999 Municipal Facilities with Greater than Five Reported Violations

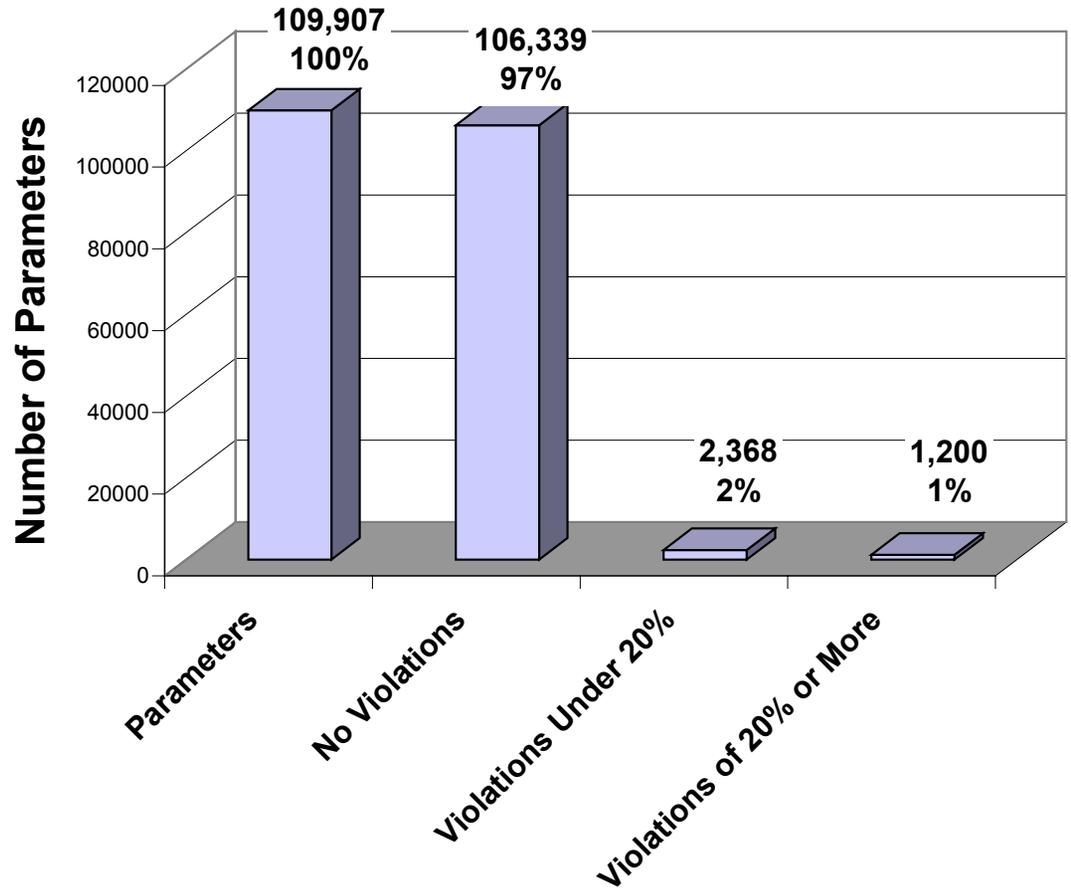


“No Action Documented” means no formal enforcement was taken, such as an order, etc.

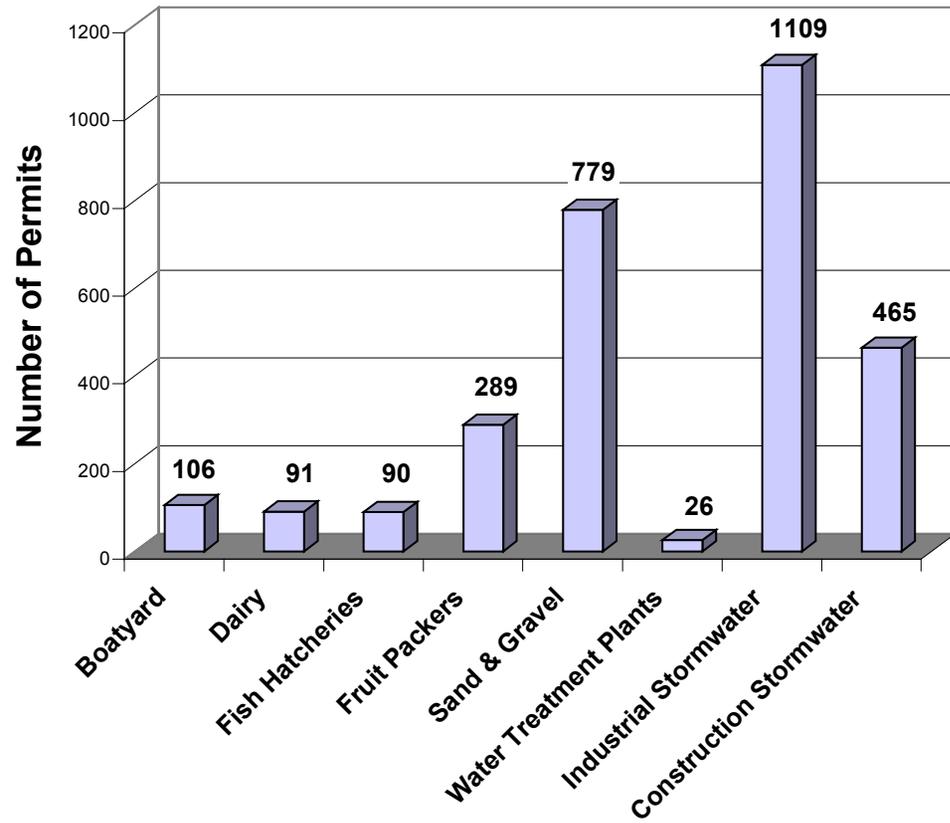
1999 Industrial Parameters



1999 Municipal Parameters



1999 General Permits



Summary of Facilities With Greater Than Five Violations

The following facilities are broken down by regions. These facilities had five or greater parameter violations. Each region has provided a short summary about the violations.

Central Regional Office Industrial Facilities

Acme Concrete Co., Richland: This facility has had turbidity and pH violations. A compliance inspection has been conducted. The facility has been purchased by Central Pre-Mix and the purchase should help improve their compliance.

Baker Produce: Problems with flow and did not report biochemical oxygen demand, total suspended solids, and general pesticides. This facility discharges to the Kennewick Wastewater Treatment Plant and issues are being addressed through pretreatment program.

Del Monte Corporation, Yakima: Oil and grease violations have occurred and did not report chlorine and total suspended solids. Technical assistance has been given. Plant is no longer discharging to the sprayfield and is now discharging to Yakima Wastewater Treatment facility.

Dickey Farms, Inc.: This facility did not report flow. No action deemed necessary.

Hi Country Foods Corporation: Hi Country Foods Corporation experienced one temperature exceedance in its discharge to surface water. The biochemical oxygen demand, pH, influent flow, and total suspended solids violations were in the discharge to the Selah Wastewater Treatment Plant and did not cause upset of the plant. The city and facility are in communication with each other. A technical assistance visit was conducted.

Hops Extract Corporation of Yakima: Biochemical oxygen demand and total suspended solids were not reported. The facility discharges to the Yakima Wastewater Treatment Plant.

John I Haas CO₂ Plant: Alkalinity and sulfate were not reported. The facility discharges to the Yakima Wastewater Treatment Plant.

KB Alloys: The facility monitors oil and grease quarterly. The facility attributes the violations of the oil and grease limit to changes in Environmental Protection Agency (EPA) analysis procedures while the permit requirements remained the same. A new permit was issued in 2000.

Milne Fruit Products: Violations for flow, pH, and temperature have occurred. Milne Fruit discharges to the Prosser Wastewater Treatment Plant.

Naumes Processing (Formerly Glico): This plant has had violations for total suspended solids, biochemical oxygen demand, pH, and flow. They also did not report flow, pH, temperature, biochemical oxygen demand, iron, fecal coliform, and total suspended solids. Technical assistance and a compliance inspection have been conducted. Facility is now under new ownership and has undergone major upgrades and is consistently in compliance with discharge limits.

Safeway Manufacturing: The facility has not submitted DMRs since September of 1999. The facility discharges to the Grandview Wastewater Treatment Plant and the treatment plant staff conducts limited monitoring of the Safeway influent to the plant and provides these results to Safeway. Further follow-up is needed to bring Safeway into compliance with the reporting requirements. Dave Lorenz of Grandview Wastewater Treatment Plant has volunteered to assist Ecology in helping Safeway.

Tree Top, Selah: This facility has had flow and temperature pH violations. The facility estimated the flows and temperatures used in establishing the limits in their last permit and their estimates were not representative. Technical assistance has been given. The facility is addressing the issues and a new permit will be issued in 2001.

Washington Frontier Juice: Washington Frontier Juice had flow and biochemical oxygen demand violations. Over production of fruit juice caused excessive levels in lagoons and consequent early discharge of material to sprayfield. Plant was discharging cooling water into lagoons at the same time, adding to the volume in the lagoons. Washington Frontier Juice has approached us about changing this practice and we have required them to complete an engineering report showing that the proposed changes meet all known available and reasonable methods of treatment, prevention, and control (AKART). A compliance inspection was conducted and found that conditions were in generally good condition. In 2000, the company negotiated an agreement with the City of Prosser to dispose of excess discharge to the treatment plant rather than discharging excess to the sprayfield.

Welches, Kennewick: This facility had pH violations and failed to report temperature and petroleum hydrocarbons. The facility implemented a self-imposed six-month compliance plan with the City of Kennewick Wastewater Treatment Plant.

Welches, Plant 1: The facility has experienced pH violations. A compliance inspection has been conducted. This plant discharges to the Grandview Wastewater Treatment Plant and the Water Treatment Plant monitors and enforces permit limits.

Welches, Plant 2: This facility has had pH violations. A compliance inspection has been conducted. The plant discharges to the Grandview Wastewater Treatment Plant and the Water Treatment Plant monitors and enforces permit limits.

Weyerhaeuser, Yakima: Weyerhaeuser exceeded its permit limit for flow. Several of the flow violations were attributed to Preventive Maintenance being conducted on two pieces of equipment on the same day. Weyerhaeuser changed its preventive maintenance schedule to prevent further exceedances of flow. Weyerhaeuser discharges to the Yakima Wastewater Treatment Plant. A compliance inspection has been conducted.

Central Regional Office Municipal Facilities

Benton City Sewage Treatment Plant: The City had biochemical oxygen demand and total suspended solids violations. The permit manager conducted an inspection. The facility hopes to upgrade soon, dependant upon funding and is currently completing a facility plan.

Cashmere Sewage Treatment Plant: The City attributed the biochemical oxygen demand violations to a malfunctioning Bulk Volume Fermentor, which provided pre-treatment of industrial wastes. Needed repairs were made. Ecology issued a notice of violation for the violations. The City completed a facility upgrade in the fall of 1999 and discharge quality has improved. Ecology is issuing a new permit as well.

Cle Elum Sewage Treatment Plant: Total suspended solids, pH, ammonia, fecal coliform, chlorine, and biochemical oxygen demand violations occurred. Inspections and technical assistance was done. The facility is undergoing an upgrade in 2000 that should enable them to comply with their permit.

Conconully Sewage Treatment Plant: Fecal coliform, flow, and total phosphorus were not reported. No action deemed necessary.

Country View Estate: Dissolved oxygen and sporadic fecal coliform violations. Dissolved oxygen violations were attributed to sampling in the wrong location. They have corrected this and are currently evaluating final disposal alternatives and amending their facilities plan and engineering report. Ecology provided technical assistance.

Glenwood Sewage Treatment Plant: Effluent biochemical oxygen demand and influent flow violations. Low priority in basin, no action deemed necessary.

Goldendale Sewage Treatment Plant: Biochemical oxygen demand, fecal coliform, pH, total suspended solids, and chlorine violations occurred. Conducted technical assistance and compliance inspections. The facility has secured funding and their upgrade will occur in 2001.

Granger Sewage Treatment Plant: Biochemical oxygen demand and ammonia violations. The Town of Granger has been unable to secure funding for plant improvements that were necessary to meet final effluent limits for ammonia and residual chlorine in its permit. Ecology conducted technical assistance visits and compliance inspections and has granted the Town permission to discharge under its interim limits until September 1, 2001.

Kittitas Sewage Treatment Plant: Total suspended solids and biochemical oxygen demand violations occurred. Conducted technical assistance visit and compliance inspections. Kittitas has secured funding for its upgrade and construction will proceed in 2001.

Klickitat Sewage Treatment Plant: Biochemical oxygen demand, chlorine usage, residual chlorine, fecal coliform, and total suspended solids violations occurred. Conducted technical assistance visit and compliance inspections. Facility is very old and the clarifier is not functioning properly. This facility desperately needs upgrading.

Lake Wenatchee Sewage Treatment Plant: The plant failed to report biochemical oxygen demand, pH, flow, chlorine, and total suspended solids violations. Conducted technical assistance visit and compliance inspections. A new permit was issued in 2000 and compliance has improved.

Lyle Sewage Treatment Plant: Biochemical oxygen demand, chlorine, and total suspended solids violations occurred. Conducted technical assistance visit and compliance inspections. Plant is overloaded and needs to be upgraded.

Mabton Sewage Treatment Plant: Total suspended solids, dissolved oxygen, biochemical oxygen demand, and chlorine violations occurred. Conducted technical assistance visit and compliance inspections. A facility upgrade was completed in 1999 and the facility has been substantially in compliance since the upgrade was completed.

Mansfield Sewage Treatment Plant: Biochemical oxygen demand, flow, and pH violations and total suspended solids not reported. Technical assistance provided. Their lagoons are undersized, effecting the biochemical oxygen demand levels and algae bloom is a contributor to the elevated pH, total suspended solids, and biochemical oxygen demand.

Okanogan Sewage Treatment Plant: Dissolved oxygen, pH, chlorine, and fecal coliform violations occurred. Conducted technical assistance visit and compliance inspections. The City has secured funding and is completing construction on plant upgrades.

Omak Sewage Treatment Plant: Biochemical oxygen demand, chlorine, pH, and total suspended solids violations. Conducted technical assistance visit and compliance inspections. The City is currently undergoing facility improvements that include replacement of the current chlorination disinfection system with ultraviolet disinfection.

Pateros Sewage Treatment Plant: Temperature, total suspended solids, dissolved oxygen, fecal coliform, and chlorine violations occurred. Funding for an upgrade has been secured and the plant is being upgraded. Technical assistance provided.

Rocky Reach Dam: Total suspended solids, pH, and chlorine violations and ammonia not reported. This facility discharges to the Columbia River and there was minimal potential for negative environmental impact. No action deemed necessary.

Roslyn Sewage Treatment Plant: Chlorine, pH, and ammonia violations. Conducted technical assistance visit and compliance inspections. Roslyn is unable to pay for a new treatment plant at this time. There are discussions with neighboring Cle Elum for development of a regional plant, but no decisions have been made. A new permit is being written and Ecology has issued an Administrative Order allowing the City to discharge under its interim limits until March 1, 2001.

Selah Sewage Treatment Plant: Total suspended solids, pH, ammonia, fecal coliform, and chlorine violations. Conducted technical assistance visit and compliance inspections. New permit being written and plant will upgrade to ultra-violet disinfection in 2001.

Stehekin Sewage Treatment Plant. The facility experienced biochemical oxygen demand and total suspended solids violations. Facility is remotely located and discharge is to septic tank and drainfield. No action deemed necessary.

Stevens Pass Sewage Treatment Plant: This plant experienced several total suspended solids violations and one each of fecal coliform, total residual chlorine, and biochemical oxygen demand violations. Access to the plant is limited during the winter due to snow, resulting in missed sampling. The plant operator is working closely with Ecology and is looking for funding to upgrade the facility.

Sunnyside Sewage Treatment Plant: Biochemical oxygen demand, ammonia, and total suspended solids violations occurred. Conducted technical assistance visit and compliance inspections. The City is developing a facility plan to plan future improvements. The plan has been submitted and reviewed. We have sent comments back to Sunnyside.

Tonasket Sewage Treatment Plant: Biochemical oxygen demand and pH violations occurred. Also failed to report alkalinity, nitrogen, phosphorus, and hardness. Conducted technical assistance visit and compliance inspections. The City has obtained funding and an upgrade is planned for spring of 2001.

Waterville Sewage Treatment Plant: The Waterville Plant discharges to a sprayfield and has experienced flow, fecal coliform, and pH violations. The Town has extensive plans to upgrade the treatment plant, has prepared a facility plan and has secured funding for the initial phases of the project. Ecology conducted technical assistance visit and compliance inspections and has issued a new permit to the Town of Waterville.

Wells Dam West and East: Chlorine and total suspended solids violations occurred. This facility discharges to the Columbia River and there was minimal potential for negative environmental impact. No action deemed necessary.

Wenatchee Sewage Treatment Plant: Total suspended solids and biochemical oxygen demand violations. The City claims that they are being negatively impacted by slug loads of material from the Public Utility District No. 1, Olds Station Pump Station. Ecology issued a Notice of Violation to the City, and we are currently negotiating an Agreed Order.

West Richland: The West Richland system consists of two treatment facilities, the North Treatment Plant and the South Sewer Lagoon/Sprayfield. Dissolved oxygen, biochemical oxygen demand, total suspended solids, and total coliform violations occurred at the South Sewer Lagoon/Sprayfield. Compliance inspections were completed. Several meetings have been held with the City regarding the violations, and we continue to work with them toward upgrading their facilities.

Winthrop: The City of Winthrop experienced biochemical oxygen demand violations that they attribute to problems at the lab. The City changed labs and has been substantially in compliance with the biochemical oxygen demand limits.

Wishram: Wishram had biochemical oxygen demand, chlorine, pH, and total suspended solids violations. Ecology conducted a compliance inspection and technical assistance visit. We have met with Wishram, and they will be applying for funding and a facility upgrade is planned, provided funding is secured.

Yakima: The City experienced chlorine and ammonia violations. Yakima is developing a facility plan for future improvements. The plan has been submitted and is currently under review with an additional engineering report to be submitted.

Eastern Regional Office Industrial Facilities

Advance Silicon Materials: Primarily oil and grease limit violations resulting from analysis of algae in their lagoon and a zero discharge limit. Did not do some metals testing that was required by the permit manager. These parameter violations had no environmental effect. Parameter limits will be changed in next permit renewal.

Columbia Lighting: After long discussions and multiple flow limit violations, Columbia Lighting has finally moved their discharge of cooling water from their HVAC cooling system from the sanitary sewer to a dedicated injection well. This will eliminate up to 50,000 gallons per day of clean water from the Spokane treatment plant system and stop violations of Columbia Lighting's flow limit.

Newman Lake Flood Control Zone District: The Newman Lake Flood Control Zone District injects alum and oxygen as part of a lake restoration project on Newman Lake. The total discharge is less than permitted. However, numerous monthly average flow violations have occurred as a result of the way the average is required to be calculated. These violations will be eliminated in the permit renewal.

Olympic Foods: This facility has had numerous flow violations that will require a permit modification to change.

Safeway Stores (Moses Lake): This facility has had numerous pH violations related to them not having adequate pH adjustment machinery. These are being installed.

Wilcox Farms Milk Plant: The Wilcox Farms Milk Plant has had numerous concentration limit violations. The plant was using less water than expected but discharging the expected total pounds of biochemical oxygen demand and total suspended solids. The effluent is discharged at night and actually helps balance the operations of the receiving Public Owned Treatment Works. These limits will be changed to a pounds per day limit in the permit renewal.

Eastern Regional Office Municipal Facilities

Albion Sewage Treatment Plant: This facility has experienced fecal coliform and pH violations resulting from an old lagoon. The plant needs funding in order to be repaired. Minimal environmental effect has occurred.

Chewelah Sewage Treatment Plant: This plant has had numerous violations that will be fixed with a major plant and sewer line upgrade currently underway.

Reardan Sewage Treatment Plant: Reardan has had the greatest number of permit violations of any facility in Eastern Region. An Administrative Order was issued requiring them to hire an additional operator. They are doing much better on sampling and testing, but they will continue to have a high number of violations until their lagoon system is upgraded. The cost of the upgrade is beyond the resources of the town. The current discharge has not had any documented environmental impact, and may even have a benefit by providing the only water to a local wildlife area during low rainfall years.

Pasco Wastewater Treatment Plant: An \$8,000 Civil Penalty and Administrative Order were issued on January 31, 2000, for ammonia and biochemical oxygen demand permit limit violations by the Pasco Wastewater Treatment Plant from March through June 1999. The Administrative Order and permit were issued because of Pasco's failure to bring the plant back into compliance in a timely manner after an upset (attributed to toxic discharges at unknown locations). The Civil Penalty covered eight out of 11 daily ammonia violations (at \$1,000 each). The Administrative Order requires the City to take a number of actions to stop the toxic discharges and to more rapidly respond to similar discharges in the future. The Administrative Order was based on our discussions with Pasco as to what they planned and needed to do to avoid future upsets.

Spokane Wastewater Treatment Plant: A discharge of untreated sewage from one of the City's combined sewer overflow outlets was reported by the public on August 22, 1999. On August 24th, the City finally found the location and repaired the plugged line. A Civil Penalty was issued on October 15, 1999, for \$15,000 for three days of illegal discharge, and two days of improper operations and maintenance. This penalty was eventually resolved with \$12,000 going to local stream restoration and \$3,000 to the Coastal Protection Fund.

Waits Lake Sewage Treatment Plant: Waits Lake is a new plant that experienced startup related violations.

Northwest Regional Office Industrial Facilities

Darigold, Lynden: The facility had two, five-day biochemical oxygen demand, three flow, one pH, and three total suspended solids limit violations in 1999. Three Notices of Violations were issued to address total suspended solids, five-day biochemical oxygen demand, and pH violations. A \$6,000 penalty was issued for a biochemical oxygen demand violation. The penalty was reduced to \$4,000 and the \$2,000 was suspended provided they comply with permit conditions for one year following the date of agreement. Site visit was conducted and technical assistance was offered to this facility in 1999.

Draper Valley Farms: Draper Valley Farms had five biochemical oxygen demand, 11 flow, one oil & grease, and three total suspended solids limit violations in 1999. A Notice of Correction was issued in May 1999 for flow violations that occurred in January, February, and March 1999. Also, a Notice of Violation was issued in October 1999 for total suspended solids and flow violation that occurred in May & June 1999. An engineering study is under way for an upgrade of the existing dissolved air flotation plant. Violations were due to increased bird throughput as well as new USDA regulations requiring increased water usage.

Hannegan Properties LLC: The violations for 1999 were for failure to report one chloride and one nitrate/nitrite from well #2. All other wells & parameters were sampled. Also, seven fecal coliform violations were noted from the lagoon. No enforcement actions deemed necessary. Facility was only operating sporadically.

Inman Landfill: The landfill has now closed, in compliance with the solid waste rules & regulations. A National Pollutant Discharge Elimination System (NPDES) permit is no longer needed. A temporary State Discharge Permit was issued in June 1998 that allows discharge of leachate to the City of Mt. Vernon publicly owned treatment works. The leachate discharge has remained in compliance except for six low pH excursions in 1999. No enforcement action deemed necessary.

Justesen Industries: This facility had failed to report in a timely manner. A Notice of Correction was issued in December 1999 for failure to report flow violations in July and August of 1999. The facility manager was reminded of the importance of completing the discharge monitoring report on time. A site inspection was conducted in 1999.

Olympic View Sanitary Landfill (OVSL): Discharge monitoring reports showed five biochemical oxygen demand and five total suspended solids effluent violations in 1999. A higher than normal rainfall generated greater amounts of sediment in the contact water, which caused the elevated total suspended solids and biochemical oxygen demand loadings. OVSL had taken measures such as flocculent and nutrient addition to optimize microbial activity and future discharge quality. They are also working with the Bremerton publicly owned treatment works to ensure that the leachate is not impacting their operations. No enforcement actions deemed necessary.

Metal Finishing: Ten copper, four pH, and four zinc limit violations occurred in 1999. Ecology issued two Notices of Violations to address copper and zinc violations. Also, a Notice of Correction was issued for copper violations that occurred in February 1999. Hazardous Waste & Toxics Reduction Program, provided technical assistance, and was able to identify the probable source of the metals. A routine sampling inspection was conducted July 30, 1999.

Powder Fab Inc.: Powder Fab Inc. had eight flow and six pH limit violations in 1999. Ecology issued a Notice of Violation in December 1999 for exceeding flow limits during February, March, April, May, and August of 1999. A \$500 penalty was issued in January 2000 for failing to submit monitoring reports on time during the months of March, April, and May of 1999. Reporting violations were explained by Permittee as being due to a personnel change. A site inspection occurred in 1999.

OeserCo.: This facility had one oil & grease, seven pentachlorophenol, and three pH limit violations in 1999. After many meetings and discussions about the on-site Environmental Protection Agency clean-up activities and progress toward installation of stormwater treatment, a Notice of Violation was issued on April 28, 2000, for the seven pentachlorophenol and three pH violations. Notice of Penalty was issued July 26, 2000, for these violations. The penalty has been appealed.

Sea Springs Co./Christmas Creek: Eleven flow, 11 settleable solids, and 11 total suspended solids violations occurred in 1999. These were mainly reporting violations. No enforcement actions were issued during 1999.

Summit Timber Co.: The facility had four application rate violations and six pH violations in 1999. During April and October of 1999, the application rate was not reported. Also, pH results were not reported during January, April, and October of 1999. A new permit will be written and issued in 2001.

Swiftsure Seafoods: This facility had six violations in 1999. These violations were for failure to report average and maximum flows during June, July, and October of 1999. No enforcement actions deemed necessary.

Nichol Bros.: The violations were for failure to report copper, lead, oil & grease, and pH during the months of February, March, May, and June of 1999. When these parameters are reported, they are usually within limits. We are foreseeing possible future enforcement. A temporary State Waste Discharge Permit was issued February 14, 1999.

Northwest Regional Office Municipal Facilities

Bainbridge Island Sewage Treatment Plant: In early 1999, the City experienced a nitrate lock caused by partial nitrification in its treatment process. Upon discovery of the problem, Ecology's technical assistance staff was called in as well as an outside consultant hired by the facility. Ecology's Enforcement staff tracked the problem by phone contact. The problem was resolved by this combination of Ecology and facility actions and no further Ecology action was taken until the permit renewal process began.

Blaine Sewage Treatment Plant: Blaine illegally discharged untreated wastewater due to a combination of high inflow and infiltration and pump station failure. Ecology issued a Notice of Violation and Civil Penalty, followed by an Administrative Order. There have been extensive enforcement and compliance activities ongoing for years at Blaine due to the aged condition of its wastewater collection and treatment systems. A new facility was being constructed in 1999, but was stopped due to the discovery of what are believed to be the remains of an ancestral Indian burial ground. Compliance activities have continued through the year 2000. Operator outreach provided.

Concrete Sewage Treatment Plant: The Town of Concrete experienced biochemical oxygen demand violations due to the overloaded condition of their sewage treatment lagoon. The Town continued to remove sludge from its lagoon and make other improvements as directed by an Ecology Administrative Order issued in 1998. The sludge removal process has shown excellent results as seen in the compliance history for the year 2000. Operator outreach was provided.

Duvall Sewage Treatment Plant: The City continued to experience sporadic violations of its copper (two months) and silver (one month) violations. Enforcement staff determined that the incorrect silver test was being performed and facility has made proper changes. The King County Local Hazardous Waste Management Team was called in to assess local businesses and provide source control through educational outreach. Report was submitted to Ecology. Operator outreach was provided.

Eastsound Water District: Eastsound was cited in this report for flow violations. The facility has doubled in size since the last permit was issued and there is no capacity problem. The permit will be renewed consistent with Ecology's basin approach to permitting. No enforcement action deemed necessary.

Everett Sewage Treatment Plant: Everett was cited in the priority violator's report for flow and biochemical oxygen demand violations. The facility has submitted a re-rating study with regard to the flow exceedances and is awaiting Ecology approval of its increased capacity for this parameter. The biochemical oxygen demand violations occurred due to partial nitrification; corrective actions are being discussed through the permit renewal process.

Ferndale Sewage Treatment Plant: Ferndale experienced problems meeting several metals limits. Upon the evaluation of new information not considered when their new permit was issued, Ecology modified their new permit, increasing the allowable level of these metals that could be discharged.

Fisherman Bay Sewage Treatment Plant: Fisherman Bay Sewage Treatment Plant experienced chronic biochemical oxygen demand and fecal coliform violations even though they upgraded their facility in 1996. The facility was under formal enforcement in recent years and has made a number of efforts to change its process control strategies to improve performance. In late 1999, the facility began performing its own fecal coliform bacteria testing with Ecology assistance and has greatly improved the accuracy of its data by reducing off-island shipment and subsequent re-growth problems. In addition, Ecology engineering staff performed a plant evaluation and made recommendations for improved performance during a meeting with District staff and commissioners. Operator outreach provided on several occasions.

La Conner Sewage Treatment Plant: La Conner Sewage Treatment Plant was cited for chronic violations of its suspended solids limits. Their problems stemmed from a combination of two sources, new plant startup problems and unexpectedly high discharges of biochemical oxygen demand from a fish processing facility on tribal lands. Due to jurisdictional problems, it was not possible for Ecology to act directly on discharges from tribal lands, technical assistance was offered. Regarding problems with plant startup and maintenance activities, a warning letter was sent. Performance improved following actions taken in response to the warning letter. Operator outreach provided.

Monroe Sewage Treatment Plant: Monroe violated its biochemical oxygen demand and fecal coliform bacteria limits. Biochemical oxygen demand violations were generally due to high flow conditions. Ecology addressed these during the permit renewal process. The facility installed a new UV disinfection system to resolve its fecal coliform violations but their efforts were only partially successful. Ecology informally requested additional testing and development of an action plan. Formal enforcement occurred in 2000. Operator outreach provided.

North Bend Sewage Treatment Plant: North Bend continued to experience sporadic silver violations in early 1999 when the plant experiences high flow due to infiltration and inflow. No enforcement actions taken. Operator outreach provided.

Pope and Talbot Sewage Treatment Plant: Pope and Talbot Sewage Treatment Plant violated its chlorine discharge limitations during January/February 1999 due to high flows from ongoing Infiltration and Inflow problems. In recent years, a program of Infiltration and Inflow rehabilitation efforts has been undertaken but has not completely resolved the problem. Disinfection was maintained and extra sampling performed. No enforcement action deemed necessary.

Roche Harbor Resort: Roche Harbor Resort violated its biochemical oxygen demand or suspended solids pound limits during four months in 1999. No enforcement action deemed necessary.

Rosario Resort: Rosario Resort experienced disinfection problems (either too much chlorine or too little causing poor disinfection). A warning call was made to the manager of the Resort, and a technical assistance call was made later in the year. The facility installed a new chlorine-dosing pump to improve their performance.

Snoqualmie Sewage Treatment Plant: Snoqualmie Sewage Treatment Plant consistently violated its copper limitations. Ecology was working informally with the facility and awaiting the results of a new water system whose water would have less corrosive properties. In 2000, the problem was eventually determined to be due to sampling inadequacies.

Sumas Sewage Treatment Plant: This facility was hit with a toxic load of chlorine in September 1999 that killed the plant. Flows were routed permanently to Canada. No enforcement action was taken against the wastewater treatment plant itself, which was not the source of the chlorine.

Vashon Sewage Treatment Plant: This facility experienced multiple operational problems during 1999. Ecology had been engaged in formal enforcement previously. Our efforts for 1999 focused on facilitating the transfer of treatment responsibilities from the Vashon Sewer District to the King County Wastewater Treatment Division. An Administrative Order was issued in 1999 following the transfer. Performance has improved greatly.

Washington Parks, Blake Island: Violations of biochemical oxygen demand and fecal coliform limits occurred. Several warning calls made. Facility is still working to complete improvements required by permit. Start-up problems with new chlorine dosing system persist (crystalizing in feed line). Ecology technical assistance officer called upon on two occasions.

Washington Parks Larrabee: Sporadic biochemical oxygen demand violation during spring and fall turnovers. No enforcement action taken. Operator outreach provided on two occasions.

Warm Beach Campground: Chronic biochemical oxygen demand violations. Ecology has required the preparation of an engineering report for a new treatment facility to resolve problem.

Southwest Regional Office Industrial Facilities

Associated Petroleum – Christensen: Violations were for failure to report oil & grease visible sheen on one quarterly Discharge Monitoring Report and benzene, ethylbenzene, hardness, pH, toluene, and xylene on another quarterly Discharge Monitoring Report. Two warning letters were sent for the violations. The permit that the facility violated has since been replaced with the General Stormwater permit.

Atlas Foundry & Machine Co.: Eleven oil & grease effluent limit violations and 15 pH effluent limit violations. These violations occurred after a compliance schedule and the permit ended. (The compliance schedule suspended these limits and required an engineering evaluation to treat oil & grease and pH if best management practices were not effective in achieving compliance with the limits.) Prior to these violations, Atlas was penalized for having a process water discharge to the storm sewer after certifying that they had eliminated all non-stormwater discharges. The Civil Penalty was settled, then the oil & grease and pH violations began once the compliance schedule ended. Two warning letters were sent for the violations. A third warning letter was sent advising the facility of its potential liability for penalties for the violations of oil & grease, pH, and failure to correct these problems under the compliance schedule. Documentation was provided showing the violations were increasing under the compliance schedule instead of being eliminated. The third warning letter was copied to TIC United, the parent company that owns Atlas. The facility then took quick action to address the violations and bring them into compliance with the effluent limits using best management practices.

Atofina Chemicals, Inc.: Twelve arsenic effluent limit violations, 14 chromium effluent limit violations, one chloroform effluent limit violation, one flow effluent limit violation. All violations occurred because the permit was written, and the effluent limits were set, based on a dilution factor that resulted from a very large cooling water flow. When the facility ceased production and the flow was eliminated, the permit was not modified to adjust the effluent limits to reflect the absence of the dilution from the cooling water flow. The permit has since been modified and it is expected that the effluent limits will be met.

Imsa Coated Steel: Three iron effluent limit violations, two mercury effluent limit violations, one naphthalene effluent limit violation, one pH effluent limit violation. Four warning letters were sent to this facility in 1999 to address effluent limit violations.

K Ply, Inc.: Eight hydrogen sulfide violations for failure to report, eight total suspended solids effluent limit violations. Monitoring and reporting for hydrogen sulfide ended on July 29, 1998, and the database was not updated to reflect this so these are not permit violations. Six warning letters were sent in 1999 for exceeding the total suspended solids effluent limit. In nearly every case where the total suspended solids effluent limit was exceeded, the facility's monitoring results showed the background levels total suspended solids in the receiving water to be greater or equal to the value reported. This is the only log yard in the region that has effluent limits applied to its runoff.

Merinos Seafood: Two biochemical oxygen demand effluent limit violations, two total suspended solids effluent limit violations, four oil & grease solids effluent limit violations. Four warning letters were sent to this facility in 1999 to address effluent limit violations. The facility completed installation of an advanced wastewater treatment system and relocated its outfall outside the Westport Boat Basin in 1999 under a settlement agreement for a previously issued Administrative Order and Civil Penalty.

Microchip Technology, Inc.: This facility is regulated by the U.S. Environmental Protection Agency and the Puyallup Tribe, Ecology did not respond to any reported violations.

Ostrom Mushroom Farms: Three total nitrogen effluent limit violations, two diazinon effluent limit violations, two formaldehyde effluent limit violations. Ecology did not respond to any reported violations due to an inadequate, out of date permit and assurances from the company to the permit manager that all composting operations are being moved indoors, thus, eliminating the discharge.

Port of Willapa Harbor: Five biochemical oxygen demand effluent limit violations, nine ammonia effluent limit violations, three total suspended solids effluent limit violations, and two flow effluent limit violations. Ecology did not respond to any reported violations due to an inadequate, out of date permit. The facility supplying wastewater to the Port's plant is currently limiting its discharge by hauling waste to dairy farm lagoons for land application under approved farm plans. This, combined with careful operation of the plant has reduced the number of effluent limit violations compared to those reported in the past.

Siemens Solar Industries: Four flow effluent limit violations and three pH effluent limit violations. Four warning letters were sent to this facility in 1999. A modification of the flow effluent limit has been requested but has not been acted on. Due to workload constraints, permit managers have deemed the modification to be a low priority because flow is not a pollutant. The June 2, 2000, modification request was not acted on within 60 days, therefore, under Chapter 90.48.200 of the Revised Code of Washington, a temporary permit authorizing the flow increase took effect on August 1, 2000.

Sorrento Lactalis, Inc.: Fifteen biochemical oxygen demand effluent limit violations, 42 chloride effluent limit violations, seven fecal coliform effluent limit violations, 20 ammonia effluent limit violations, 22 total suspended solids effluent limit violations, 16 iron effluent limit violations, nine pH effluent limit violations, 31 total dissolved solids effluent limit violations, two lead effluent limit violations, 29 manganese effluent limit violations, two conductivity effluent limit violations, one nitrate effluent limit violation, two total nitrogen effluent limit violations, two sulfate effluent limit violations, one temperature effluent limit violation, and one water elevation effluent limit violation. This facility was under an Administrative Order with a compliance schedule that required ground water quality standards to be met or the discharge had to be routed to the sanitary sewer by October 31, 1999. In the Administrative Order, Ecology stated that it would use its prosecutorial discretion and not act on any effluent limit violation during the compliance period. The facility was not able to comply by the deadline and routed its discharge to the sanitary sewer. One year later, the facility closed.

Wafertech LLC: Six pH effluent limit violations. Four warning letters were sent to this facility in 1999. The facility traced the source of the violations to a condensate discharge and routed it into its process water system thus eliminating the discharge and the violations.

Southwest Regional Office Municipal Facilities

Beverly Beach Sewage Treatment Plant: This plant has continual problems meeting permit limits for parameters such as Fecal Coliform. This plant plan is to connect to the Lacey, Olympia, Tumwater Treatment Plant.

Bogies Truck Stop: The plant was closed in September 1999 and the permit was cancelled. There were no provisions to retain the permit and the facility was decommissioned and destroyed.

Camas Sewage Treatment Plant: After spending the year in construction, a new facility was placed online in December 1999. Several observations were made of the construction in progress in 1999. There were some initial startup problems in 2000, which were resolved with the addition of caustic and the requirement for the WaferTech to assume the responsibility for appropriately buffering their wastewater prior to discharge to the Public Owned Treatment Works. The Public Owned Treatment Works has requested a permit modification to revise their removal rate requirements.

Carbonado Wastewater Treatment Facility: This plant is an aerated lagoon system followed by chlorine disinfection and has been operating since 1969. It currently serves a population of about 500 people. Carbonado replaced their lagoon liner and made improvements to their chlorine contact chamber and outfall in 1987-89. In 1998-99 baffle walls were installed dividing the lagoon into thirds. It was hoped that this would improve the biochemical oxygen demand removal.

Castle Rock Sewage Treatment Plant: This aging trickling filter plant will be replaced by a new activated sludge plant soon.

Chehalis Sewage Treatment Plant: The Permittee was issued a modified permit in June of 2000, which increased their limits for metals and ammonia peak concentrations. This was in keeping with agreements we made in a Consent Decree with this and other parties, and resolves most of the non-compliance issues for the near term. The Permittee also submitted a draft general sewer plan and facility plan for construction of a new facility. The Permittee is obliged by the Consent Decree to a maximum 10-year time frame for construction of a new facility (from January 2000). The new facility being proposed will be growing poplar trees with reuse water during the dry weather season. Ecology has been working closely with the facility to ensure that reuse standards are achievable, and that the project can proceed smoothly.

Cherrywood Mobile Home Park Wastewater Treatment Facility: This wastewater facility consist of a bar screen headworks, extended aeration package plant with sludge storage, chlorination, and slow sand filtration and has been in operation since 1969. This is a small facility that serves a population of about 140 people.

Clallam Bay Sewage Treatment Plant: Rotating biological contactor that has occasional upsets. The plant has been improving in operations.

Cowlitz Water Pollution Control (Sewage Treatment Plant): Existing activated sludge plant 24 years old. Has reached its design life. They are now in the construction process to increase the capacity. Discharge Monitoring Reports have been submitted infrequently and are filled out incorrectly. Compliance is difficult to determine since this is a discharge to ground facility and discharge monitoring report data is unreliable. Site visits are planned to look at sampling sites and to explain how the discharge monitoring reports should be filled out and that they need to be submitted monthly.

Elbe Water and Sewer District Wastewater Treatment Facility: This small facility serves a population of about 87 people. It consists of a community septic tank followed by a recirculating gravel filter with final disposal to a mound system.

Enumclaw Wastewater Treatment Facility: This is a rotating biological contacts process for secondary treatment and ultraviolet light for disinfection. The Public Owned Treatment Works was completed in May 1980 and currently serves a population of about 9,631. Enumclaw is currently working on their water supply to make it less corrosive in order to reduce the copper in their discharge. They are also going to completely redesign their wastewater treatment plant to increase reliability and to remove phosphorus due to a total maximum daily load (TMDL) on the White River. This work should help reduce the amount of copper in the discharge and make the plant more reliable.

Fort Columbia State Park Sewage Treatment Plant: A small, old rotating biological contacts plant that is discharging to the Columbia River. The outfall has plugged in past years. The flow meter system was marginal. The chlorination system was tablets. The influent strength varies because it comes from septic tank effluent. Sometimes solids from the septic tank overflow give a higher reading on the influent biochemical oxygen demand and total suspended solid. When the septic effluent values are low, it is difficult for the plant to meet 85 percent removal. Operators need a better way to get influent sample or need to give them credit for septic treatment as part of their 85 percent removal.

Ilwaco Sewage Treatment Plant: This new plant opened in 1999. Ecology will be granting additional (conditional) hookups but will not lift the existing moratorium.

Kalama Sewage Treatment Plant: The City's treatment plant was inspected and a new permit issued during 1999. The new permit required an increase in monitoring frequency that revealed that the facility is organically and hydraulically overloaded. The City completed Infiltration and Inflow work on a \$1.2 million loan in 1999, and has been conducting some additional Infiltration and Inflow work on their own during 1999 which continues. During 1999 and 2000, approximately 90 to 95 percent of residences were smoke tested to ensure the integrity of their sewer lines and 40 to 60 houses were made to repair their laterals. The City worked on design of treatment plant improvements in 1999, but has recently committed to a complete Public Owned Treatment Works replacement in a new general sewer plan to be completed late summer of 2001.

Lacenter Sewage Treatment Plant: The City has done significant amounts of Infiltration and Inflow work. Their Infiltration and Inflow work has freed up additional capacity allowing them to add additional customers. These efforts are largely responsible for restoring compliance with their permit limits. They are planning to install a new Sequencing Batch Reactor plant within the next five years. Their new plant will provide a higher level of treatment to reliably meet anticipated limits on chlorine and ammonia. The plant was inspected in 1999 to evaluate the proposed improvements that were scheduled at that time.

Larch Correction Center: The facility was inspected in 1999, and it was found that they were having some minor problems getting all their components on line from the new construction. The problems were resolved, and they have remained in compliance.

Lewis County Water District No. 2 (Onalaska): In 1999, they proposed a new plant for 2000. This plant is in construction and will soon be operational. Noncompliance is expected to be eliminated by this action.

Long Beach Sewage Treatment Plant: Long Beach has an approved facilities plan to expand the capacity and reliability of the treatment plant. They are making preparations for construction of Phase I.

LOTT: Performance has improved in 2000 with very good effluent quality.

McCleary Sewage Treatment Plant: McCleary is another old trickling filter plant that has reached the end of its life-cycle. They are in planning to replace it. Estimated time line is 2004.

Millersylvania State Park: There is no record of actions in 1999. This facility has problems both in the operational and technological areas. We are developing a strategy to resolve these issues as expeditiously as possible.

Montesano Sewage Treatment Plant: Relatively new Biolac activated sludge plant should be doing well, more staffing may be needed.

Morton Sewage Treatment Plant: An older oxidation ditch. Violates limits at times during winter high flows because of hydraulic limitations.

Olympic Corrections Center: This plant changed from an aerated lagoon to activated slough, the new process has taken some time to learn. Technical Assistance has been provided by Ecology.

Orting Wastewater Treatment Facility: Orting uses a Sequencing Batch Reactor for secondary treatment facility with ultraviolet disinfection and a sludge storage lagoon. The sequencing batch reactor system just came online in 1999. The Orting facility has plans to expand their current facility in order to accept flow from the proposed Cascadia development. They also plan to upgrade to produce Class A reclaimed water. These expansions to the facility will make the facility more reliable and will include additional treatment to bring it up to Class A reclaimed water standards.

Pacific Beach Sewage Treatment Plant: This facility has had violations of total suspended solid, pH, and fecal coliforms. No action deemed necessary.

Pe Ell Sewage Treatment Plant: Pe Ell was inspected in 1999. During 1999, the Permittee completed a significant amount of Infiltration and Inflow work. The Permittee was convinced through our attendance at town council meetings and educational efforts to commit to short-term fixes and to the construction of a new treatment plant. Staff turnover, however, has caused some setbacks. Ecology has been actively working with the Permittee's engineer to ensure that this construction project stays on track. To date, both additional Infiltration and Inflow work and plans for a new facility are on track.

Port Townsend Biosolids Facility: This facility has had high nitrate discharges in the past that have, for the most part, been controlled and improved in 2000.

Puyallup Wastewater Treatment Facility: The City is still awaiting reissuance of their National Pollution Discharge Elimination System permit from Environmental Protection Agency, which will include the new design flows and loadings. They are still operating under their expired permit which has the old flow and loading requirements of the Rotating Biological Contactor system and does not reflect their current facility. They keep showing up on the violators list because they are still being held to the design loadings of their expired permit.

Ryderwood Sewage Treatment Plant: A huge facultative lagoon system that discharges to Becker Creek, a small tributary. They have very bad Infiltration and Inflow problems and are nearing completion of planning to address the Infiltration and Inflow problems.

Seki Sewage Treatment Plant: A continual problem facility that has received increased visits and sampling inspections from Ecology, in hopes of causing more conscientious efforts by the operator.

Sequim Bay State Park Sewage Treatment Plant: The Parks Department does not put in the time or effort necessary to effectively operate this facility or to meet permit testing and reporting requirements. They have plans to close the plant and replace with a pipeline to the City of Sequim Sewage Treatment Plant.

South Bend Sewage Treatment Plant: South Bend is an overloaded lagoon system. They are one of the planning partners of the North Pacific Counties Infrastructure Action Team Group. So far, they have done an Infiltration and Inflow report to help improve the plant performance by lower flow in the wintertime. They will not address plant capacity till after the total maximum daily load on the Willapa is completed and they know what they have to design to.

Surfside Inn Condo #1 Onsite: An old tertiary activated sludge package plant serving the condo complex. Not all of the unit processes are working as designed. A lot of the controls for filter backwash for example are nonfunctional. The Chlorine contact chamber tends to get a considerable amount of solids deposition and the operator has been asked to pump it out more frequently, which should mean less chlorine will need to be used and they should have a better die off of fecal coliform with less residual chlorine.

Vader Sewage Treatment Plant: A two-cell lagoon that discharges into the Cowlitz. Not much controls on a lagoon. High winter flows cause problems.

Washougal Sewage Treatment Plant: Washougal was in construction of a new treatment facility in 1999. We inspected the interim operation and the construction in progress in 1999. The Permittee completed the facility construction in the spring of 2000 and has reported exceptionally good treatment ever since.

Westport Sewage Treatment Plant: Extended aeration oxidation ditch. This plant violated total suspended solids and biochemical oxygen demand only the month of February, no other violation occurred.

Wilkesons Wastewater Treatment Facility: This new facility consists of new headworks, bioselectors, extended aeration basin, two secondary clarifiers, and a sludge holding pond. This new plant replaces the previous wastewater treatment plant, constructed in 1971, consisting of two aerated lagoons. Wilkeson has had a hard time keeping a full-time wastewater treatment operator, which made start up of the facility very difficult. They currently have a full time operator who has been there for several months resulting in a significant improvement in the quality of the effluent leaving the plant. By having the position of operator stable the facility will continue to improve and should be able to consistently meet permit limits.

Woodbrook Sewage Treatment Plant: An old rotating biological contactor plant that has exceeded its design life. A new plant is being planed.

Yelm Wastewater Treatment Facility: Yelm's lagoon treatment system was replaced by a Sequence Batch Reactor with an increased capacity to 1.0 million gallons per day that included tertiary facilities consisting of coagulation, flocculation, and filtration followed by disinfection in order to produce Class A reclaimed water. Yelm's collection system consists of septic tanks located at homes and businesses that are then pumped to the wastewater treatment facility. Influent first passes through individual septic tanks prior to discharge to the Wastewater Treatment Facility. Yelm is not required to meet 85 percent removal for total suspended solid and biochemical oxygen demand at the treatment plant, since solids are also removed in the septic tanks prior to discharge to the plant.

Appendix A

Outline for the 2000 Water Quality Annual Discharge Limit Violations and Compliance Report.

Draft Outline for the 2000 Water Quality Annual Discharge Limit Violations and Compliance Report

Executive Summary

Introduction

- Enforcement Philosophy
- State of the Environment
- State of the Program
 - ◆ How Effective is the Program?
 - Median Action Time
 - Number of Cases Appealed, Lost, Won
- Enforcement Resources vs. Duties: Ecology FTEs assigned by category, location
- Water Quality Enforcement Guidelines
 - ◆ Regulatory Drivers
 - ◆ Enforcement Process
 - ◆ Understanding Compliance Rates
- Laboratory Accreditation Program
- Technical Assistance

The Water Quality Regulated World in Washington

- Introduction
- NPDES Discharge Permits
- State Waste Discharge Permits
- Nonpoint Dischargers
- General Permits

Other Current Activities Affecting Enforcement

- Watershed Industry Sweeps
- Water Cleanup Plans
- Regulatory Changes
- Grants/Loans

Industrial Facility Enforcement

- Permit Universe/Complexity
- What Violations Occurred
- What Actions Were Taken
- What Actions Were Most Effective: Compliance Narratives
- Current Enforcement Issues
- Recommendations for Improvement

Municipal Facility Enforcement

- Permit Universe/Complexity
- What Violations Occurred
- What Actions Were Taken
- What Actions Were Most Effective: Compliance Narratives
- Current Enforcement Issues
- Recommendations for Improvement

Other General Permits, i.e., Enforcement Related to Stormwater at Construction Sites, Sand and Gravel Permits, Water Treatment Plants, Fruit Packers, Boatyards

- Permit Universe/Complexity
- What Violations Occurred
- What Actions Were Taken
- What Actions Were Most Effective: Compliance Narratives
- Current Enforcement Issues
- Recommendations for Improvement

Dairy Enforcement

- Permit Universe/Complexity
- What Violations Occurred
- What Actions Were Taken
- What Actions Were Most Effective: Compliance Narratives
- Current Enforcement Issues
- Recommendations for Improvement

Nonpoint Enforcement

- Permit Universe/Complexity
- What Violations Occurred
- What Actions Were Taken
- What Actions Were Most Effective: Compliance Narratives
- Current Enforcement Issues
- Recommendations for Improvement

Criminal Actions

Appendix A: List of All Active Formal Actions by Ecology

Appendix B: Other Priority Violators

Appendix C: GIS Maps

Appendix D: Glossary