Industrial Pretreatment Newsletter

Published for industries regulated by the King County Industrial Waste Program (KCIW)



King County

Department of Natural Resources and Parks Wastewater Treatment Division Industrial Waste Program

Summer 2016

KCIW works with facilities to make sure their wastewater is treated properly. This protects communities, the environment, and the economy.

Congratulations, 2015 award winners!

Tell your customers and clients about your award! King County celebrates award winners on web pages and in media releases. We can provide graphics, logos, and copies of press releases to help you spread the word. Give us a call at 206-477-5300 or email info.KCIW@kingcounty.gov.

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Clean Water Awards -The Envelope Please...

Each spring, KCIW recognizes facilities that have done an excellent job maintaining compliance and preventing pollution. Their work protects communities, the environment, and the economy in our region. This year 56 percent of eligible permit holders received awards.

The Commitment to Compliance Award honors facilities that have received a Gold Award for five consecutive years. Congratulations to:

Skills Inc. - Auburn Facility

The Gold Award honors facilities that have had no violations or late reports during the year. Congratulations to these 52 facilities:

- A.O. Smith Corp.
- Aerojet Rocketdyne Inc.
- Alaskan Copper Works 6th Ave.
- Aramark Uniform & Career Apparel LLC
- ASKO Processing Inc.
- Black Oxide LLC
- BNSF Railway Co. Interbay Facility
- Boeing Commercial Airplane North Field
- Boeing Commercial Airplane Renton
- Boeing Company Plant 2 Facility
- Boeing Electronics Center
- BP West Coast Products LLC
- CMC ICOS Biologics Inc.
- Eldec Corp.
- Encore Oils LLC

(Continued on page 2)

(AWARDS continued from page 1)

- Esterline Hytek Finishes Co.
- Foss Maritime Company
- G & K Services
- GM Nameplate Inc.
- Kenworth Truck Co.
- King County Road Services Division -Renton Decant Facility
- King County Solid Waste Division -Algona Transfer Station
- King County Solid Waste Division -Bow Lake Transfer Station
- King County Solid Waste Division -Renton Transfer Station
- King County Solid Waste Division -Vashon Transfer Station
- Magnetic and Penetrant Services Co.
- Mastercraft Metal Finishing Inc.
- National Industrial Concepts
- National Products Inc.
- Port of Seattle, Sea-Tac International Airport, IWS
- Primus International -University Swaging Division
- Protective Coatings Inc.
- Prototron Circuits Inc.
- Ralcorp Frozen Bakery Products
- Red Dot Corp °.
- Safeway Inc. Beverage Plant
- Seattle Public Utilities Kent Highlands Landfill
- Seattle Public Utilities South Transfer Station
- Shasta Beverages
- Skills Inc. Auburn Facility

- Skills Inc. Ballard Facility
- Smith Brothers Farms Milk Plant
- Spiration Inc. dba Olympus Respiratory America
- Ste. Michelle Wine Estates
- Terex Washington Inc. South Campus
- Tim's Cascade Snacks
- TOC Holdings Co.
- Tri-Way Industries Inc.
- Universal Sheet Metal Inc.
- Western Pneumatic Tube Company LLC
- WSDOT Alaskan Way Viaduct Replacement Project, SR 99 Bored Tunnel

The Silver Award honors facilities that have met requirements with no more than one late report or a few self-monitoring violations. Congratulations to these 13 facilities:

- Cedar Grove Composting Inc.
- Coca-Cola Bottling Company of Washington
- Darigold Inc. Rainier Plant
- Davis Wire Corp.
- Kerry Inc.
- MicroSurgical Technology
- Northwest Cascade Inc. -Septage Thickening and Dewatering Facility
- Rabanco Recycling Co.
- Safeway Inc. Milk and Ice Cream Plant
- Sanofi-Aventis U.S. LLC
- Sound Transit Northgate Link Extension -Maple Leaf Portal (Phase 2)
- Terex Washington Inc. North Campus
- University of Washington School of Dentistry

EnvirOvation Award application deadline Nov. 1

KCIW encourages all permitted facilities to apply for its annual EnvirOvation Award for excellence in pretreatment. For a downloadable application, and to learn about the awards criteria, visit www.kingcounty.gov/industrialwaste or contact the program.



KCIW Updates

EPA Metal Finishing Regulations

On March 8, 2016, KCIW participated in a U.S. **Environmental Protection Agency** (EPA) briefing on pretreatment standards for the metal finishing industry. EPA periodically reviews the national regulatory standards for waste-water called "effluent guidelines." The first effluent guidelines for metal finishing were promulgated in 1983 and were reviewed again in 1991. Pollutant discharge guidelines for the metal finishing industry were last reviewed in 2011. With the most recent review, EPA is looking at



factors such changes in industry demographics, new technologies, pollution prevention practices, and issues with the existing rule. KCIW and other pretreatment coordinators provided preliminary input on EPA's study. KCIW asked EPA to specify how older facilities should be handled under 40 CFR 413. KCIW currently regulates 40 facilities under CFR 433 and four under CFR 413. KCIW will continue to update customers about EPA's review of effluent guidelines.

For more information on EPA's effluent guidelines, visit: https://www.epa.gov/eg

Regulatory Guidance for Cannabis Operations update (Version 3) is now available

See the "Other Resources" list on the KCIW webpage at www.kingcounty.gov/services/ environment/wastewater/industrial-waste/library/resources.aspx

New Process for Appeals

The King County Hearing Examiner's procedures for appeals and associated code were recently changed. When appleaing, permittees now have 24 days from date of the director's final decision to appeal to the King County hearing examiner, rather than 15. This is from date of decision, not the date permittees receive the decision. In addition, KCIW appeal requests and associated fee must now be filed with the Wastewater Treatment Division directly. See section of 28.84.100 of the King County Code available via the KCIW website: www.kingcounty.gov/services/environment/wastewater/industrial-waste/limits-regulations/regulations.aspx.

Construction Dewatering

New Construction Dewatering Authorization Saves Time





In March 2016, King County launched a new, simpler general authorization process for small construction projects.

Industrial Waste Engineer Ed Abbasi noticed that King County used the same process for every construction dewatering application, regardless of the size of the project or its potential impact on water quality. Contractors, local sewer agencies, and King County had to gather and review the same documentation whether the project was a new small development on less than one acre or a large tunneling project.

"This was a lot of wasted effort," Abbasi said. "The new General Authorization for Construction Dewatering process is estimated to save King County several hundred hours of staff time every year."

The general process uses a shorter application that requires no exhibits. There are minimal monitoring require-ments and no reporting requirements to King County. It offers a quicker turn-around and lower cost.

Learn more at: www.kingcounty.gov/services/ environment/wastewater/industrial-waste/business/ construction.aspx

There are five steps to get a general authorization:

- 1. Confirm local sewer agency accepts construction water
- 2. Select King County's process: General or Individual
- 3. Download and complete King County's application
- 4. Submit signed application to King County
- 5. Contact local sewer agency to get a connection

To be eligible for a General Authorization for Construction Dewatering, construction sites must:

- Discharge less than 25,000 gallons per day
- Have no contamination
- Be less than one acre
- Have an approved sedimentation tank

Other construction projects still need to apply for Individual Authorization.

KCIW's 2016-17 Fees and Charges

King County's Industrial Waste Program is funded by fees paid by businesses. Each year, KCIW reviews and sets fees to recover the cost of operating the program. KCIW's fee period runs from July 1 through June 30. Changes in 2016 included the following:

• The fees for issuing permits and authorizations increased to recover costs.

• Annual monitoring fees and post violations fees remained the same for the second year in a row. KCIW is conducting a thorough review of these fees and plans to make changes in the future. Currently the fees for heavy metals and fats, oils and grease do not reflect our region's broad industrial base. KCIW will continue to update customers about the changes as they are developed.

- Surcharge fees changed significantly. (See below)
- A new fee was created for the Construction Dewatering Letter of Authorization (see article on page 4).

2016 Changes for Surcharge Fees

The surcharge fees that businesses pay King County for high-strength waste will be updated over four years, beginning in July 2016.

Surcharge fees pay for the extra cost of treating high strength wastewater, which is more concentrated than domestic wastewater. They are typically assessed to food and beverage manufacturing facilities and other sources of high strength wastewater. The method for calculating the fee was last updated in 1990. It no longer captures the full cost of treating high-strength waste.

King County is responsible for distributing wastewater treatment costs fairly among all rate payers. The County is making two major changes:

- Use recent data from businesses instead of long-term average data to calculate the surcharge.
- Update the way treatment costs are allocated to reflect today's treatment systems.

These two changes will affect each business's bill differently. Our region has had some of the lowest charges for "biochemical oxygen demand" (BOD) treatment on the West Coast. When they are fully implemented, these changes will bring our fees in line with our peer agencies. It is our responsibility to all our ratepayers to charge businesses the true cost of treating their waste.

Fee/Charge	Bill paid to
Permit/authorization fees	King County
Monitoring fees	Local sewage agency
High-strength surcharge	Local sewage agency
Post-violation sampling, analysis, and administrative fees	King County
Fines	King County
Sewer rates	Local sewage agency
Capacity charge	King County

Who do you pay for sewer service?

King County treats the sewage from 34 local sewage agencies at its five treatment plants. The local agencies bill for some fees and King County charges others (see table). You can find more information about King County sewer charges online at www.kingcounty.gov/RatepayerReport

KCIW Fees and Charges

(Effective July 1, 2016 through June 30, 2017)

1. High Strength Surcharge		
Biochemical Oxygen Demand	\$0.2373/pound	
Total Suspended Solids	\$0.3933/pound	
2. Monitoring Fees		
Heavy Metals	\$0.003579/gal.	
FOG (fats, oils, and grease)	\$0.000382/gal.	
Special Monitoring Fees	Variable	
3. Permit and Authorization	n Fees	
Waste Discharge Permit	\$5,500	
Major Discharge Authorization	\$2,750	
Minor Discharge Authorization	\$1,500	
Letter of Authorization	\$950	
Construction Dewatering Letter of Authorization	\$800	
4. Post-Violation Fees		
Administrative)	
Full Enforcement Action	\$5,000	
Enforcement - No Further Action	\$2,500	
Inspection	\$535	
Sampling and Analysis		
BNA (Semi-volatile Organics)	\$1,605	
Cyanide	\$755	
Cyanide Amenable to Chlorination	\$1,005	
FOG (Nonpolar) Set of 3 Samples	\$645	
FOG (Free-floating) Grab	\$505	
Heavy Metals	\$695	
pH Grab	\$505	
pH Continuous	\$1,010	
SETV (Settleable Solids)	\$555	
VOA (Volatile Organics)	\$1,305	
5. Fines		
Up to \$10,000 per violation per day		

1 Surcharge fees

Businesses that send "high-strength" or more concentrated waste to the sewer pay an extra surcharge based on how much material is in their wastewater. High-strength waste contains a higher concentration of "total suspended solids" (TSS) and "biochemical oxygen demand" (BOD) than typical wastewater. BOD is a measure of organic material that uses up oxygen in the water. The surcharge fee covers the cost of treating this high-strength waste and administration of the surcharge program. Administration costs represent approximately 10 percent of the overall cost of the surcharge program.

2 Compliance monitoring fees

Additional fees are required to monitor facilities to make sure they stay within the limits set for heavy metals and fats, oils, and grease (FOG). These fees pay for the cost of required inspections, sampling and analysis, and overall management of the permit.

3 Permit and authorization fees

King County issues different types of approvals for facilities to send industrial wastewater into the sewer. The type of approval needed depends on the industrial process, the volume of wastewater, and whether it is short or long-term. Permit and authorization fees cover up to a 5-year period. Fees are set to recover the cost of issuing the documents only. Facilities with permits pay a separate fee for the cost of monitoring to ensure compliance (see No. 2). Industrial users are not charged for any revisions of a permit initiated by the County.

4 Post-violation fees

Facilities that violate the regulations are required to reimburse King County for the costs associated with the violation. Post-violation fees include the cost of preparing enforcement documents, additional inspections, additional sampling, and analysis. Based on King County Code, the Wastewater Treatment Division seeks to recover the full cost associated with violations from those that violate the rules.

5 Fines

Fines for violations can reach \$10,000 per dayper violation. Businesses are also liable for any damages and additional costs caused by their discharges, such as the cost to clean a blocked sewer line.

Questions about the KCIW's fees? Contact the program Info.KCIW@kingcounty.gov.

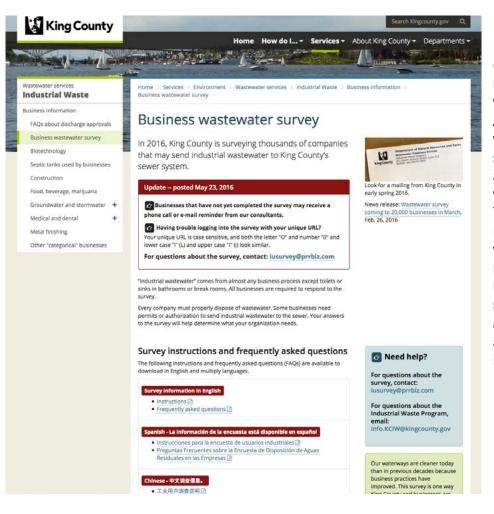
KCIW Business Survey

In March 2016, King County surveyed about 20,000 businesses about the waste-water they generate and send to the regional sewer system. This comprehensive survey is the largest industrial user survey since King County's Industrial Waste program began operating in 1969. Businesses that already have discharge permits or authorizations from KCIW were not surveyed.

Typically KCIW user surveys focus on specific business sectors. "For this comprehensive survey, we hired a local research firm to help," said Pat Magnuson, Industrial Waste Investigator. The team worked to increase participation by making sure the survey was easy to complete. They used the latest technology and best practices, including the following:

- Online survey
- Clearly worded questions
- Electronic signature system
- Available in 6 languages
- · FAQs online and email responses to to specific questions





Responses will support King County's efforts to protect regional water quality and comply with federal requirements. All facilities must dispose of their wastewater properly. But, only some need permits or formal authorization to send industrial wastewater to the sewer. The survey results will help King County better understand which facilities may need to monitor or pretreat wastewater before discharging it to the sewer system. Information about the survey is available at www.kingcounty.gov/ IndustrialWaste.

How to Avoid Penalties

Late submissions are a frequent and preventable reason for violations and fines. Plan ahead. File your applications and reports on time.

Did you know...

- Your permit shows your specific deadlines
- You can contact King County and ask for an extension to avoid being late
- You can send your reports electronically to KCIW by emailing info.KCIW@kingcounty.gov

Facilities that violate clean, water rules receive penalties

Industries must pretreat the water they use before they send it to the sewer. They have to monitor and report how they are doing. This protects people, the environment, and the economy. 😵 King County

Department of Natural Resources and Parks Wastewater Treatment Division

King County's Industrial Waste Program helps businesses meet requirements. Most companies in King County do an excellent job following clean water rules.

From July to December 2015, these companies were in "significant noncompliance" with federal rules and/or received fines.

Company and Type of Violation	Reason for Publication
Encore Oils LLC REPORTING VIOLATION: For failure to submit required report by deadline.	Significant noncompliance. Fined \$500. The report was submitted. No further action.
Cosmos Development Company – Lake Hills Development Construction Project REPORTING VIOLATION: For failure to file required report by deadline.	Fined \$400. The report was submitted. No further action.
Marine Vacuum Service Inc. DISCHARGE VIOLATION: For n-Decane, n-Octadecane, copper, lead and zinc. PERMIT VIOLATION: For failure to notify King County prior to discharging contaminated wastewater and for discharging unapproved waste stream.	Fined \$7,930 and required to reimburse the county \$15,945 for additional monitoring costs. Received a compliance order to evaluate their pretreatment system and procedures.
Oberto Brands PERMIT VIOLATION: For failure to meet deadline for installation of pretreatment system as required by Compliance Order. DISCHARGE VIOLATION: For multiple pH violations.	Significant Noncompliance. Installation of pretreatment system is complete and operational. Fined \$1,125 and required to reimburse the county \$7,555 for additional monitoring costs.

Other violations

The King County Industrial Waste Program acted on 16 more violations at 13 organizations from July to December 2015. These were not in "significant noncompliance." They did not receive fines. Where applicable, they reimbursed the county for additional monitoring costs. Questions or information for King County?

- Email info.KCIW@kingcounty.gov
- Call 206-477-5300 or 711: TTY Relay
- Visit www.kingcounty.gov/industrialwaste

Find What You Need on KCIW's New Web Page

The KCIW website has a new look and feel. In February 2016, it migrated to a new format that is more compatible with tablets and phones. The site has more photos and a new organization.



To help users find what they need quickly, KCIW reorganized the site and is creating comprehensive "Business Information" pages for each business sector. The pages contain information and links to resources each kind of business needs. For example, contractors can learn about the new construction dewatering process (see article page 4) on the "Construction" Dewatering page.

New comprehensive business information pages are being developed now. In the meantime, simple business pages provide links to the forms. In the future, look for revised content.
Website users can also find forms and resources in the site's library.
www.kingcounty.gov/IndustrialWaste



This material is provided in alternative formats upon request by calling 206-477-5300 and TTY relay: 711

Contact information

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