



NPDES Compliance Inspection Report

City of Wapato Wastewater Treatment Plant

Wapato, WA

NPDES Permit # WA0050229

Inspection Date: June 18, 2024

Prepared by:

Rick Cool
U.S. Environmental Protection Agency, Region 10
Enforcement & Compliance Assurance Division
Water Enforcement & Field Branch
Surface Water Enforcement Section

Inspector Signature/Date:

RICHARD COOL	Digitally signed by RICHARD COOL Date: 2024.08.08 16:13:01 -07'00'
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Supervisor Signature/Date:

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(Unless otherwise noted, all details in this inspection report were obtained from conversations and communications (e.g., emails, submissions, etc.) with Amber Musgrave, Wastewater Treatment Plant Lead Operator, and Jeff Schumacker, Public Works Director, and from reviews of documents and direct inspection observations)

I. Facility Information

Facility Name:	City of Wapato Wastewater Treatment Plant (Facility)
Facility Owner/Operator:	City of Wapato, Washington
Physical Address:	68170 U.S. Highway 97 Wapato, WA 98951
Lat/Long:	46.434326, -120.422001
Mailing Address:	205 East 3 rd Street Wapato, WA 98951-1326
Facility Contacts:	Jeff Schumacker, Public Works Director (m) (509) 853-8013 Email: jschumacker@wapato-city.org Amber Musgrave, Lead Operator (o) (509) 877-3031 Email: amusgrave@wapato-city.org
Permit Number:	WA0050229
Receiving Water:	Drainage Way #2 → Wanity Slough → Yakima River

II. Inspection Information

Inspection Date:	June 18, 2024
Inspectors:	Rick Cool, Nicolas Haddad
Arrival Time:	8:45 a.m.
Departure Time:	Approximately 1:45 p.m.
Weather:	Sunny, hot

Purpose: To evaluate and determine Facility compliance with the National Pollutant Discharge Elimination System (NPDES) Permit No. WA0050229 and the Clean Water Act (CWA).

III. Permit Information

The Facility is permitted under NPDES Permit No. WA0050229 (herein, 2023 Permit) that was issued, as modified, in September 2023 and effective on October 1, 2023. This current permit and the discharge authorization will expire at midnight, September 30, 2028.

The Facility's prior NPDES permit was issued on September 15, 2011 (herein, 2011 Permit) and it became effective on November 1, 2011. The 2011 Permit expired on October 31, 2016 but it was administratively extended until issuance of the 2023 Permit's effective date.

As noted below, the City of Wapato and EPA entered into a consent agreement and final order (i.e., CAFO Docket No. CWA-10-2021-0126) and an administrative order on consent (i.e., AOC Docket No. CWA-10-2021-0125) for past violations associated with the 2011 Permit, including effluent limitation violations that occurred through February 2020.

Accordingly, the scope of this June 18, 2024 EPA inspection included the period of time since March 1, 2020, including discharge monitoring reports submitted by the City of Wapato through April 2024 and related matters up through the inspection date, June 18, 2024.

IV. Background

According to the EPA's 2023 Permit-related 2022 Fact Sheet, the City of Wapato owns and operates the Facility located in Wapato, Washington. The Facility's sanitary sewage collection system has no combined sewers. The Facility serves a resident population of 5,058. The Facility receives domestic wastewater from commercial and residential sources and also receives industrial wastewater from three local fruit packing plants.

The EPA 2022 Fact Sheet notes the Facility design flow is 1.16 million gallons per day (mgd) and the reported actual flows between April 2017 and February 2022 ranged from 0.436 to 0.922 mgd (average monthly flow).

The EPA 2022 Fact Sheet notes in late 2015, the Facility upgraded to a Membrane Bio-Reactor (MBR) system for secondary treatment. The MBR system uses a combination of a suspended growth biological treatment method, and membrane filtration. In addition, the Facility uses ultraviolet (UV) disinfection.

The Facility Outfall 001 discharges into Wapato Irrigation Project (WIP) Drainage Way No. 2. The WIP Drainage Way No. 2 drains into Wanity Slough, which empties into the Yakima River. The Facility discharges to the Yakama Nation's tribal waters.

Attachment A of this inspection report includes an aerial photo (map) of the Facility showing the layout of the Facility and identifying locations of major Facility treatment units and installations.

Attachment A also includes a schematic of the Facility's wastewater treatment process/flow and a schematic of the Facility's sludge flow process. The Attachment A map and schematics were included in the EPA's 2022 Fact Sheet as Figures 3-5.

The Facility was last inspected by EPA on October 27, 2019.

The Facility was subject to two formal compliance enforcement actions after the 2019 inspection. In 2021, EPA and the City of Wapato entered into a consent agreement and final order (i.e., CAFO Docket No. CWA-10-2021-0126) for primarily past effluent limitation violations (e.g., ammonia, zinc, copper) where the City agreed to pay a penalty of \$25,750. The City also agreed, with EPA, to an administrative order on consent (i.e., AOC Docket No. CWA-10-2021-0125) requiring the Facility to undertake corrective actions related primarily to implementation of engineering solutions and anticipated Facility upgrades to address the chronic metals-related effluent limitation violations.

V. Inspection Chronology

This was an announced inspection. On May 28, 2024, I emailed Elizabeth Sanchey and Will Badonie, Yakama Nation's Environmental Program, regarding the EPA's proposed June 2024 compliance evaluation inspection and the Yakama Nation's potential participation. In subsequent communications with Blythe Delarosa, I received confirmation of tribal interest and intent to participate in any scheduled Facility inspection.

On June 10, 2024, I emailed Mr. Schumacker and Ms. Musgrave with my introduction and proposed compliance evaluation inspection project, and during a subsequent call, agreement was reached on EPA conducting the Facility inspection on Tuesday, June 18, with an anticipated 9:00 a.m. start time.

We (Nicolas Haddad and me) arrived at the Facility at about 8:45 a.m. We entered the Facility office and introduced ourselves to Ms. Musgrave, Mr. Schumacker and Ms. Susan Welland, a Wastewater Plant Specialist, Gray & Osborne, Inc. (consulting engineers).

EPA credentials were presented to the Facility representatives and I provided the Facility staff with a copy of EPA's small business information fact sheet. Shortly after our arrival, Wil Badonie and Joe Herrera, Yakama Nation Environmental Program inspectors, arrived and made introductions. Mr. Badonie and Mr. Herrera participated in the entire inspection.

The EPA inspectors were accompanied by Facility representatives and the Yakama Nation inspectors during the entire inspection. EPA inspectors were not denied access to any part of the Facility during the inspection.

During the inspection, I conducted an opening conference followed by a cursory records review, then a Facility tour/walk-around and finally, a closing conference. Post-inspection, the Facility provided some additional records and sampling documentation which I reviewed upon receipt.

VI. Opening Conference

After an initial routine opening conference discussion of inspection scope, logistics, and related miscellaneous inspection information, I used a question-and-answer format to learn about the Facility's staffing and recent operations.

The Facility currently employs three certified operators. The Facility is attended to seven days a week and generally four-10 hour days with an operator on-site on Friday – Sunday, 2 hours per day. The four 10-hour days are generally 6:00 a.m. to 4:30 or 5:00 p.m. depending on length of the lunch period.

At the time of the June 2024 inspection, the primary clarifier had an inoperable skimmer arm due to a gear drive failure but the clarifier settling solids and removal capability was still functional. The grinder that was out of service at the time of the EPA's 2019 inspection and the source of an EPA area-of-concern then has been deemed to not be needed and it has been abandoned.

I asked about the cause of the April 2024 discharge monitoring report's (DMR) data entries about the effluent limitation exceedances for Total Ammonia as N. The 2023 Permit requires the Facility to monitor this ammonia pollutant parameter once-per-week. Facility representatives did not have any explanation as to limit exceedances and cause(s) of the following April 2024 DMR entries for the Total Ammonia as N concentration and loading requirements:

Limit Type	2023 Permit Limit	DMR Value	% Exceedance
Monthly Avg	0.7 mg/L	15.9 mg/L	2,171
Daily Max	2.6 mg/L	17.1 mg/L	558
Monthly Avg	7.0 lbs/day	72.5 lbs/day	936
Daily Max	25.0 lbs/day	87.7 lbs/day	251

The City has not experienced any sanitary sewer overflows since the 2019 EPA inspection's inquiry about existence of overflows that pre-existed that 2019 inspection.

Facility influent and effluent flows are measured using electromagnetic flow meters (i.e., magmeters). The EPA 2019 inspection report indicated the magmeters were inspected and calibrated bi-annually but in response to my questions about the frequency of magmeter calibration, Facility staff indicated the magmeters had never been calibrated.

Drainage Way No. 2 upstream flow measurements are taken upstream of the Facility Outfall 001 near the footbridge. The drainage way upstream flow is measured manually using a graduated gage (i.e., marked points on a visual scale) attached to a steel fence post that is driven into and anchored into the drainage way bank. See Photo 7 in Attachment B, Photograph Log, of this inspection report for a photo of the gage/fence post on the bank located near the footbridge.

The gage scale observation is then compared to and evaluated against an existing calibrated drainage way gage height chart (which chart apparently takes into account the physical dimensions of the Drainage Way No. 2 at the Facility location). A copy of the gage height chart was provided to the EPA inspectors and is included with this inspection report as Attachment D. The chart is identified as a U.S. Department of Interior (DOI) Geological Survey rating table for “Drain 2 Wapato Sanitation Outlet” (dated March 14, 1988). The chart includes a gage height measurement x-and-y axis table and an associated “second-foot” entry (i.e., cubic feet per second) that can then be calculated to determine upstream drainage way flow in million-gallons-per-24-hours once the flow depth measurement is evaluated using the table/chart.

Facility effluent and influent 24-hour composite sampling is conducted with refrigerated Sigma and ISCO auto-samplers collecting, on a time proportioned basis, approximately 20 milliliters per sample into a 5-gallon jug over a 24-hour period. The final sample for analysis is drawn from each of the sampler’s time-composited 5-gallon jug sample. Receiving water pollutant parameter sampling of the Drainage Way No. 2 is done by grab samples.

The Facility is currently not conducting 24-hour composite sampling of the receiving water but is instead obtaining one receiving water grab sample upstream and one receiving water grab sample downstream of the Facility’s Outfall 001.

Receiving water temperatures are being taken Monday-Friday, usually in the mornings.

Facility sludge is picked up and transported to a regional collection-composting facility in Sunrise, Washington.

Under the 2021 AOC, the City, through Gray & Osborne, Inc. (consulting engineers), submitted a Wastewater Facility Plan Amendment (G&O #23809, October 2023) to EPA that outlined a wastewater treatment facility (WWTF) metals compliance study schedule as means to achieve compliance with the Facility’s NPDES permit effluent metals limits. The October 2023 Amendment’s anticipated project schedule indicated that follow-up testing (including pilot studies) would be conducted during October – December 2023 (p. 1-2) with completion of the pilot tests targeted for January 2024 (pp. 5-7 through 5-8). When I asked about the status of the pilot studies during the inspection, Facility representatives indicated the metal removal pilot study/testing is still ongoing as of this EPA June 2024 inspection.

VII. Site Tour

We did a site tour/walk-around where EPA inspectors examined and made observations of all major on-site physical components of the Facility, including all areas where effluent is treated and conveyed. Attachment B, Photograph Log, of this inspection report includes the photos identified below taken during the inspection. Site tour areas included the following:

- Headworks (Photo 1);
- Rotary drum screens (Photo 2);

- Influent sampling point and auto-sampler;
- Primary clarifier (Photo 3);
- Anoxic selector tanks;
- MBR's pre-aeration basins (Photo 5);
- UV disinfection units (Photo 6);
- Sludge digestors;
- Sludge drying beds and dried sludge storage area (Photo 4);
- Drainage Way No. 2 upstream sampling/flow measurement location (Photo 7); and
- Effluent auto-sampler (Photo 8).

VIII. File Review

I reviewed the following records and documents as part of the total inspection process:

- NPDES Permit No. WA0050229 (the 2023 Permit). The Facility had a copy of the 2023 Permit available on-site.
- NPDES Permit No. WA0050229 (the 2011 Permit). As noted previously, the scope of this current EPA inspection included time periods covered by the prior NPDES permit (i.e., the 2011 Permit) going back to March 1, 2020.
- Discharge Monitoring Reports (DMRs). EPA Integrated Compliance Information System (ICIS) generated monthly DMR data pulls, including electronic DMRs, for March 2020 through May 2024. Note: the Facility's actual May 2024 DMR data was not yet ICIS-available at the June 10, 2024 date of the ICIS data pull.
- EPA-Generated Violations Report & NCEP Report. ICIS-generated Violations Report and a National Compliance Evaluation Program (NCEP) Report for the time period of March 1, 2020 through May 31, 2024. Note: the Facility's actual May 2024 DMR data was not yet ICIS-available at the June 10, 2024 date of the ICIS data pull. See Attachment C of this inspection report for the Violations Report.
- Quality Assurance Plan (QAP). The Facility had available the latest QAP edition, June 2022.
- Operation and Maintenance Plan (O&M Plan). Both the 2011 and 2023 Permits require an O&M Plan. The Facility provided EPA with a copy of the O&M Plan prepared by Gray & Osborne, Inc. (consulting engineers), dated December 2016 for EPA's confirmation of the O&M Plan's existence and availability at the Facility.
- Whole Effluent Toxicity (WET) Reports. For WET reports, I reviewed EPA records for available WET reports back to the date of the 2019 EPA inspection (August 27, 2019) and post-inspection, other WET reports submitted by the Facility in July 2024, based on this inspector's request for additional documentation of WET sampling/lab results and

reports. The EPA inspector request was made during the June 18, 2024 inspection for anything WET report related generally available back to the 2019 inspection time period.

- Selected monthly sampling data documentation. I conducted a cursory review of some analytical data and calculation sheets used to document Facility laboratory and commercial lab results for the preparation of DMRs.
- Selected calibration records for the Facility pH meter and dissolved oxygen meter.
- PFAS 2023 Sampling Data. During the inspection, EPA requested copies of any PFAS sampling data done to date since issuance of the 2023 Permit. The Facility provided a copy of pages 1-2 of an apparent 6-page lab report (reported December 28, 2023) from Anatek Labs, Inc. for a single Facility PFAS sample taken December 6, 2023 analyzed using a drinking water matrix. The two-page excerpt of the Anatek Labs, Inc. 6-page report for the single Facility PFAS sample only is included as Attachment E to this inspection report.
- 2023 Permit Notifications to EPA. The 2023 Permit requires the Facility to provide written notification that an O&M Plan has been developed and is being implemented and that a QAP has been developed and is being implemented. The Facility was able to produce the U.S. Postal Service green-colored receipt return cards for the submissions of these two notifications apparently mailed to EPA. However, this inspection report includes an area-of-concern that the existing June 2022 QAP that was in effect when the Facility notified EPA of a QAP having been developed and being implemented is an outdated QAP that is not accurately reflective of the 2023 Permit requirements.

IX. Areas of Concern

A. Effluent Limit Exceedances

The 2011 Permit, Part I.B., states in part: “The permittee must limit and monitor discharges from outfall 001 as specified below. All figures represent maximum effluent limits unless otherwise indicated. The permittee must comply with the effluent limits in the tables at all times unless otherwise indicated, regardless of the frequency of monitoring or reporting required by other provisions of the permit.” Table 1 of Part I.B. shows the effluent limits and monitoring requirements for all identified monitored parameters listed therein.

The 2023 Permit, Part I.B., also states in part: “The permittee must limit and monitor discharges from Outfall 001 as specified in the Table below. All figures represent maximum effluent limits unless otherwise indicated. The permittee must comply with the effluent limits in the tables at all times unless otherwise indicated, regardless of the frequency of monitoring or reporting required by other provisions of the permit.” Table 1 of Part I.B. shows the effluent limits and monitoring requirements for all identified monitored parameters listed therein.

As part of this inspection, I reviewed ICIS-generated DMRs from March 2020 through April 2024. The DMR results including numerous effluent limit exceedances during this time period are summarized in the Violations Report, Attachment C to this inspection report, which attachment is incorporated herein by reference.

Please note, the Violations Report characterizes effluent limit exceedances as effluent violations using a violation code E90.

The area-of-concern is that the Facility is regularly exceeding NPDES permit effluent limits for multiple parameters. Some DMR non-exceedance limit data anomalies discussed in another area-of-concern below.

B. April 2024 Ammonia-as-N Effluent Limit Exceedances

The 2023 Permit, Part I.B., Table 1, has more restrictive Total Ammonia-as-N effluent limits for the Facility's Outfall 001 discharge for the period from April 1 through October 31. Table 1 requires the Facility to monitor effluent for Total Ammonia-as-N once-per-week, using a 24-hour composite sample. As noted above, the Facility's April 2024 DMR included the following DMR value entries for this pollutant parameter:

Limit Type	2023 Permit Limit	DMR Value	% Exceedance
Monthly Avg	0.7 mg/L	15.9 mg/L	2,171
Daily Max	2.6 mg/L	17.1 mg/L	558
Monthly Avg	7.0 lbs/day	72.5 lbs/day	936
Daily Max	25.0 lbs/day	87.7 lbs/day	251

I highlight these particular effluent limits exceedances in part because ammonia-as-N limit exceedances do not appear to have occurred since the August – October 2015 time period listed in the 2021 CAFO so these April 2024 exceedances portend some potential new issues of concern with Facility operations. Additionally, Facility representatives did not have any explanation as to the cause(s) of these ammonia-as-N exceedances when asked about them during the June 2024 inspection.

C. Flow Proportional 24-Hour Composite Sampling Protocol

The 2023 Permit, Part VII., Definitions, Item No. 35, defines “24-hour composite” as follows: “24-hour composite” sample means a combination of at least 8 discrete sample aliquots of at least 100 milliliters, collected over periodic intervals from the same location, during the operating hours of a facility over a 24 hour period. *The composite must be flow proportional.* The sample aliquots must be collected and stored in accordance with procedures prescribed in 40 CFR 136. (italics added for emphasis).

The Facility is not conducting flow proportional 24-hour composite sampling in accord with the 2023 Permit sampling requirements. The evidence indicates the Facility is using a time-proportional 24-hour sampling method. For example, Facility effluent and influent 24-hour composite sampling is conducted with refrigerated Sigma and ISCO auto-samplers collecting, on a time proportioned basis, approximately 20 milliliters per

sample into a 5-gallon jug over a 24-hour period. The final Facility sample for laboratory analysis is drawn from each of the auto-sampler's time-composited 5-gallon jug sample.

D. No 24-hour Composite Sampling of Required Receiving Waters Samples

The 2023 Permit, Part I.D, Receiving Water Monitoring, requires monitoring in the WIP Drainage Way No. 2 in accord with the Part I.D. Table 5, which requires a 24-hour composite sample type for the following four (4) pollutant parameters: pH, hardness as CaCO₃, Total Phosphorus and Total Nitrogen. The 2023 Permit, Part VII, Definitions, states in relevant part that the 24-hour composite sample must be flow proportional.

The Facility has not installed the sampler equipment and supporting infrastructure capability to conduct automated 24-hour flow-proportional composite sampling of the Drainage Way No. 2 upstream and downstream of the Facility Outfall 001. At this time, the Facility is still using the grab sample type to sample and monitor for these four pollutant parameters from the drainage way.

E. Flow Measurement of Receiving Waters

The 2023 Permit, Part I.D, Receiving Water Monitoring, requires monitoring in the WIP Drainage Way No. 2 in accord with the Part I.D. Table 5, which requires a "meter" sample type for the flow parameter, once-per-week upstream and downstream of the Facility's Outfall 001.

At the time of the inspection, the Facility had not installed a stationary flow meter(s) or metering equipment and supporting infrastructure capability to conduct a meter sample type of the Drainage Way No. 2 flow upstream near the footbridge and downstream of the Facility Outfall 001.

At the time of the inspection, the Facility measured drainage way upstream flow manually using a graduated gage (i.e., marked points on a visual scale) attached to a steel fence post that is driven into and anchored into the drainage way bank. See Photo 7 in Attachment B, Photograph Log, of this inspection report for a photo of the gage/fence post located near the footbridge. The Facility staff's visual observation of the drainage way flow depth on the gage (visual scale) is then evaluated using a 1988 DOI Geological Survey gage height chart/rating table to convert the visual observation of the drainage flow depth on the gage scale to an estimated upstream flow rate for the Drainage Way No. 2 at that upstream-of-the-Outfall location.

An additional area of concern (in addition to the lack of a meter sample type requirement discussed above) is that the gage/steel fence post location in the drainage way bank does not appear to be located to easily and accurately evaluate low flows within the drainage way with the potential for vegetative growth (e.g., bank grasses) to obscure some lower portions of the gage/steel fence post. It appears some maintenance may be needed around the gage/steel fence post on a periodic basis to ensure visual observations of the

drainage way water level on the gage scale can be done efficiently, safely and without any obscured view of the gage scale.

Note also, during post-inspection information exchanges, Facility staff apprised this inspector on August 7, 2024 that to confirm the flow estimate results using the graduated scale gage, the Facility bought a Global Water Instrumentation portable flow probe (Model FP211) that has an expandable probe rod, ranging in length from 5.5 feet to 14 feet. The web-available Global Water 2009 User's Manual description for this Model FP211 states, in part, the flow probe is a velocity instrument for measuring flows in open channels and partially filled pipes and that the water velocity probe consists of a protected propeller and water bearing for measuring water velocity, coupled to a telescoping probe handle ending with a LCD display flow computer.

F. Temperature Sampling of Receiving Waters

The 2023 Permit, Part I.D, Receiving Water Monitoring, requires temperature monitoring in the WIP Drainage Way No. 2, upstream and downstream of the Facility Outfall 001, five-times-per-week in accord with the Part I.D. Table 5, Footnote No. 1 which states:

- “Sampling must occur Monday through Friday, once a day between April 1 and October 31. Sampling must occur between 5pm and 6pm.”

The evidence, including Facility employee hours of routine Facility attendance, indicates the Facility is not conducting Drainage Way temperature monitoring routinely during the 5:00 pm – 6:00 pm Permit-required time period, and that the receiving water temperature monitoring is usually conducted in the mornings.

G. Weekly Visual Observations of Receiving Waters & Observation Log

The 2023 Permit, Part I.B.2.b. includes a specific weekly visual observation requirement and related record keeping regarding the subpart 2.a. narrative limitation on the no-discharge requirement regarding floating, suspended or submerge matter of any kind in concentrations causing nuisance or objectionable conditions or that may impair designated uses of the receiving waters.

Part I.B.2.b. states: “The permittee must observe the surface of the receiving water weekly in the vicinity of where the effluent enters the surface water. The permittee must maintain a written log of the observation which includes the date, time, observer, and

whether there is the presence of floating, suspended, or submerged matter. The log must be retained and made available to EPA or the Yakama Nation upon request.”

The EPA requested to view a copy of this written observation log during the records review part of the inspection. The Facility was not able to produce the observation log because a written log of receiving water observations is not being created and retained.

H. DMR Submission of Receiving Water Monitoring Results

The 2023 Permit, Part I.D.8.a. states: Receiving water monitoring results must be reported on the monthly DMR.

The Facility’s DMRs do not contain and include the Drainage Way No. 2 monitoring results and the Facility is not routinely submitting the receiving waters monitoring results on a monthly basis to EPA using any other form for submission.

I. DMR Coding & Entries

The 2011 Permit, Part III.B., requires the permittee to summarize all monthly monitoring results on the DMR. The 2011 Permit, Part X.E. provides that reports (e.g., DMRs) must be signed and certified which certification (Part X.E.4.) provides the report is certified as “true, accurate, and complete.”

For context, the EPA’s 2022 Fact Sheet reported that after the 2011 Permit was issued, the Facility’s chlorine disinfection system was replaced with ultraviolet disinfection and that there is no longer a source of chlorine in the Facility’s discharge. The EPA’s 2019 inspection report states the Facility ceased using chlorine as a disinfectant in November 2015.

The Facility’s DMRs for March – August 2020 use a NODI-8 entry (i.e., Other – see comments) for total residual chlorine (TRC) entries, and each of the DMRs includes the following comment in the DMR Comment section: No chlorine in use . . . UV disinfection only.

Beginning in September 2020 and through September 2023, the Facility’s DMR entries for TRC was NODI-B (Below Detection Limit/No Detection) which was not a correct entry because the Facility continued to use only UV disinfection and no sampling for TRC was occurring because the Facility was not using chlorine for disinfection.

This same/similar coding error was raised to the Facility’s attention as an area-of-concern in the EPA 2019 inspection report. At that time and in regard to the DMR’s TRC entries, the Facility was apprised to use NODI-9 (Conditional Monitoring – Not Required for this Period). The NODI-9 entry should have been used for the September 2020 – September 2023 DMRs when TRC was not being used in the Facility or sampled for.

J. DMR Entry Computations & DMR Entries

As part of this inspector’s evaluation of Facility zinc/copper DMR anomalies (see related area-of-concern below), I requested the Facility to provide all of the lab reports for

applicable weekly and/or monthly samples for the three months of May-June 2023 and October 2023. Facility submissions were made post-inspection in response to this inspector request and the submissions were reviewed.

As background, the 2011 Permit, Part I.B., Table 1, has a total recoverable zinc average monthly concentration limit of 25 µg/L and a maximum daily concentration limit of 52 µg/L

The Facility's internal May 2023 sample computation worksheet indicated that the four weekly copper sample results were all non-detect, and that 3 of 4 weekly zinc sample results were non-detect but that the May 2, 2023 weekly zinc sample result was reported from the lab report as 182 µg/L. The corresponding LabTest lab report (reported May 11, 2023) confirmed the May 2 zinc sample result was 0.182 mg/L or 182 µg/L. However, the Facility's May 2023 DMR included a NODI-B entry (i.e., Below Detection Limit/No Detection) for all DMR zinc concentration and loading entries, including a NODI-B for the May 2023 DMR maximum daily limit entry.

K. Whole Effluent Toxicity (WET) Tests & DMR Data Entries or Lack Of

The 2011 Permit, Part I.B., Table 1, Footnote 5, requires the Facility to sample and conduct WET testing quarterly.

During a pre-inspection record review of available EPA ICIS/DMR data indicated that no WET testing was done and reported in Facility DMRs from a period after October 2018 through September 2023, except for a WET test result in the November 2021 DMR. Based on a DMR data pull for the March, 2020 – September, 2023 time period, the DMRs had a NODI-9 entry (i.e., Conditional Monitoring; Not Required This Period.) despite the fact that the 2011 Permit required quarterly WET testing.

Post-inspection, the Facility sent this inspector a box of WET lab reports, mercury sampling information and other Facility DMR related monthly computation worksheets that I reviewed and are the basis for the following areas-of-concerns regarding WET testing and related DMR reporting.

The Facility did not provide WET lab reports for the following six (6) calendar quarters: Q2 2019; Q1 2020; Q3 2020; Q2 2021; Q1 2023; and Q3 2023. The lack of WET lab reports for these 6 calendar quarters, in combination with the Facility's NODI-9 entries for the same 6 calendar quarters indicates the Facility failed to conduct WET testing during those 6 calendar quarters.

The Facility's box of WET lab reports included WET lab reports for the following nine (9) calendar quarters during my target time period of March 2020 through September 2023: Q2 2020; Q4 2020; Q1 2021; Q3 2021; Q1 – Q4 2022; and Q2 2023. The existence of these 9 WET lab reports indicates the Facility's DMR NODI-9 entries were not accurate or correct and that the Facility failed to file accurate and complete DMRs regarding WET sampling and testing.

L. Total Recoverable Mercury Sampling and DMR Entries

The 2011 Permit, Part I.B., Table 1, Footnote 6 requires the Facility to sample for total recoverable mercury on a calendar quarterly frequency after the first year of the 2011 Permit.

During a pre-inspection record review of available EPA ICIS/DMR data indicated that no mercury testing was done and reported in Facility DMRs for three calendar quarters: April – June 2021; January – March 2022; and April – June 2023. Each DMR mercury entry for these 3 calendar quarters specified NODI-9 (i.e., Conditional Monitoring – Not Required This Period).

Post-inspection, I reviewed and evaluated the Facility's box containing mercury-related documentation and this review/evaluation is the basis for the following areas-of-concern.

The Facility box submission did not include any sample results lab reports for mercury sampling for the calendar quarter January – March 2022. The combination of the Facility's DMR NODI-9 entry and lack of any confirming documentation indicates the Facility failed to conduct required mercury monitoring for this calendar quarter.

In the Facility box submission, I found documentation indicating mercury samples were taken with reportable lab results for the April-June 2021 and April-June 2023 calendar quarters. The existence of these two calendar quarters of reportable mercury sampling results indicates the Facility's DMR NODI-9 entries were not accurate or correct and that the Facility failed to file accurate and complete DMRs regarding mercury sampling.

M. PFAS Sampling

The 2023 Permit, Part I.B., Table 1, requires the Facility to sample and report sampling results for Per- and Polyfluoroalkyl Substances (PFAS) for PFAS in the Facility influent, effluent and sludge on a frequency of twice-per-year. The 2023 Permit, Part I.B.11, requires potential PFAS sampling of discharges of industrial dischargers if any PFAS is detected in the Facility's influent, effluent or sludge sampling completed by three years after the effective date of the 2023 Permit.

During the inspection's opening conference, EPA asked whether the Facility had conducting any PFAS sampling to date and if so, what were the results. In response to this inquiry, the Facility provided a copy of pages 1-2 of an apparent 6-page lab report (reported December 28, 2023) from Anatek Labs, Inc. for a single Facility PFAS sample taken December 6, 2023 analyzed using a drinking water matrix. It is not readily apparent from this 2-page lab report excerpt whether the Facility's December 6, 2023 PFAS sample was of the Facility influent or the effluent. The two-page excerpt of the Anatek Labs, Inc. 6-page report for the single Facility PFAS sample only is included as Attachment E to this inspection report.

The areas-of-concern is that the Facility must implement PFAS sampling/testing of all three potential sources of PFAS presence – i.e., Facility influent, effluent and sludge and

do this 3-source sampling at least twice-per-year since the October 1, 2023 effective date of the 2023 Permit.

N. Emergency Response and Public Notification Plan

The 2011 Permit, Part II.D., requires the Facility to develop and implement an overflow emergency response and public notification plan (herein ERP). The City was required to submit a written notice to EPA and the Yakama Nation that an ERP had been developed and was implemented within six months of the effective date of the 2011 Permit (effective date: November 1, 2011).

The 2023 Permit, Part II.F., requires the Facility to develop and implement the same type of ERP as required in the 2011 Permit. Additionally, the City was required to submit a written notice to EPA and the Yakama Nation that an ERP had been developed and was implemented within 180 days of the effective date of the 2023 Permit (effective date: October 1, 2023).

During the inspection's record review, EPA requested to review a copy of the Facility ERP. Pre-inspection review indicated EPA had not received any written notification of the ERP's existence or implementation. During the inspection, Facility representatives confirmed there was no existing ERP.

O. June 2022 Quality Assurance Plan (QAP)

The 2023 Permit, Part II.C., states in part: "The permittee must develop a quality assurance plan (QAP) for all monitoring required *by this permit.*" (italics added for emphasis).

Facility representatives acknowledged their current June 2022 QAP is their only QAP. A cursory review of the June 2022 QAP demonstrates it has not been revised, updated or modified to conform to the 2023 Permit's monitoring requirements. In fact, the June 2022 QAP's signature page (all three signatures dated June 9, 2022) has a revision date of June 2, 2022, approximately 25 days prior to the EPA's issuance of the 2022 Fact Sheet on or about June 27, 2022.

The June 2022 QAP pre-dates even the draft permit that EPA initially public-noticed in June 2022 and as a consequence, this existing QAP does not accurately reflect the 2023 Permit monitoring requirements.

P. June 2022 Quality Assurance Plan (QAP)

The 2011 Permit, Part II.B.3.c), required the QAP to include qualification and training of Facility personnel.

The Facility's June 2022 QAP, Section 1.5, stated that initial training for new operators on sampling and analytical methods and QA/QC requirements and procedures will be conducted on a priority basis; that additional training is conducted periodically (two days per year) as required to maintain competence in analytical skills; and that records of all training are kept in each trainee's personnel folder.

During the inspection's record review, EPA requested to see copies of the annual QAP, Section 1.5 training records for 2022 through 2024 to date. Facility representatives acknowledged formal QAP-based annual training was not conducted and no QAP-related training records existed or were produced for EPA review.

Q. Twenty-Four Hour Notice Noncompliance Reporting & 5-Day Report

The 2011 Permit, Part I.B.4. states: "The permittee must report within 24 hours any violation of the maximum daily limits for the following pollutants: *E. coli* bacteria, total residual chlorine, total ammonia, total recoverable copper and total recoverable zinc. Violations of all other effluent limits are to be reported at the time that discharge monitoring reports are submitted (See III.B. and III.H.)."

The 2011 Permit, Part III.G.1.d), Twenty-four Notice of Noncompliance Reporting, requires the permittee to report violations of the maximum daily discharge limitations for applicable pollutants identified by Part I.B.2. within 24 hours from the time the permittee becomes aware of the circumstances and under Part III.G.2., the permittee must also provide a written submission addressing all of the informational requirements in Part III.G.2.a) through 2.e) for these applicable violations of the maximum daily discharge limits.

The 2023 Permit, Part I.B.5. states: "The permittee must report within 24 hours any violation of the maximum daily limits for the following pollutants: *E.coli*, *ammonia* and *zinc*. Violations of all other effluent limits are to be reported at the time that discharge monitoring reports are submitted. (See Permit Parts III.B *Reporting of Monitoring Results* and III.G *Twenty-four Hour Notice of Noncompliance Reporting* of this permit."

The 2023 Permit, Part III. G.1.d), Twenty-four Hour Notice of Noncompliance Reporting, requires the permittee to report violations of the maximum daily discharge limitations for applicable pollutants identified by the 2023 Permit, Part I.B., within 24 hours from the time the permittee becomes aware of the circumstances and under Part III.G.2., the permittee must also provide a written submission addressing all of the informational requirements in Part III.G.2.a) through 2.e) for these applicable violations of the maximum daily discharge limits.

I reviewed the Surface Water Enforcement Section (SWES) NPDES 24-hour Noncompliance Hotline inventory going back through 2019 and I did not identify any entries associated with the Wapato Facility calling in any maximum daily limit exceedances. Additionally, I reviewed the EPA ICIS_Reports folders in the EPA Region 10 N drive and could not locate any Wapato Facility 5-day written reports submitted in accordance with the Part III.G.2. of either the 2011 or 2023 Permits.

The EPA Violations Report (Attachment C) shows routine maximum daily limitation exceedances of the total zinc limit going back to March 2020, exceedances of the total copper maximum daily limitation during the months of December 2022 and September

2023, and a very significant total ammonia-as-N maximum daily limit exceedance (both concentration and loading limits) in April 2024.

The area-of-concern is that the Facility is not making the 24-hour noncompliance notification and submitting the required follow-up 5-day written report in accordance with its NPDES permit requirements.

R. Other Noncompliance Reporting

The 2011 Permit, Part III.H., Other Noncompliance Reporting, states: “The permittee must report all instances of noncompliance, not required to be reported within 24 hours, at the time that monitoring reports for Part III.B. (“Reporting of Monitoring Results”) are submitted. The reports must contain the information list in Part III.G.2 of this permit (“Twenty-four Notice of Noncompliance Reporting”).”

The 2023 Permit, Part III.H., Other Noncompliance Reporting, states the permittee must report all instances of noncompliance, not required to be reported within 24 hours, at the time that monitoring reports for Permit Part III.B.III.A. [sic], *Reporting of Monitoring Results* are submitted, and that these reports must contain the information listed in the Permit, Part III.G *Twenty-four Hour Notice of Noncompliance Reporting*. This Part III.H. also contains more specific reporting requirements for noncompliance events associated with combined sewer overflows, sanitary sewer overflows or bypass events.

I reviewed the ICIS-Reports folder in the EPA Region 10 N drive and the Facility’s DMR Comment section and routinely, I could not locate any additional Facility noncompliance reporting for other violations, including non-maximum daily limit violations (e.g., monthly average exceedances), that should have been made and submitted under these 2011 and 2023 Permit provisions.

S. 2023 & 2024 Zinc and Copper DMR Entry Anomalies

During pre-inspection preparation and as I was reviewing historical DMRs, I identified a peculiar deviation related to a pattern of NODI-B (i.e., below detection limit/no detection) DMR entries for zinc and copper limit results in 2023 and 2024. Given this Facility’s historical issues with metals limits exceedances, the apparent sudden pattern of NODI-B entries appeared to be an anomaly which is summarized in the table below.

Month/Year	<u>Zinc</u>	<u>Copper*</u>
2011 Permit required weekly samples for both metals.		
May 2023	X	X
June 2023	X	X
July 2023	X	X
Aug 2023	X	X
Sept 2023		
Oct. 1 2023 Permit required weekly zinc & monthly copper		

Month/Year	<u>Zinc</u>	<u>Copper*</u>
samples.		
Oct 2023	X	X
Nov 2023	X	X
Dec 2023		
Jan 2024		
Feb 2024		X
Mar 2024		X
(*) Copper: Also, X for June, July & Sept 2022 which would have been 2011 Permit weekly copper samples.		

I brought this information to the attention of the Facility representatives during the inspection for their consideration and response. The Facility representatives did not have any explanation or insights for the apparent sudden changes in effluent pollutant parameter concentrations and these NODI-B entries. It was not clear from the on-site inspection discussion of this information whether the Facility was going to review the matter in an effort to determine the causes or reasons for the apparent sudden non-detection sample results.

X. Closing Conference

After the site tour, I did a brief closing conference with Mr. Schumacker, Ms. Musgrave and Ms. Welland and discussed my site tour observations and a preliminary list of areas of concern identified during the inspection and records review, noting these were preliminary areas of concern subject to review, supplementation and revision. Mr. Badonie and Mr. Herrera were also in attendance for this closing conference. After this closing conference, I thanked the Facility representatives for their time, help and cooperation for this inspection process, then we departed the Facility.

ATTACHMENT A – Facility Aerial & Process Schematics



Figure 3 Facility Layout Diagram

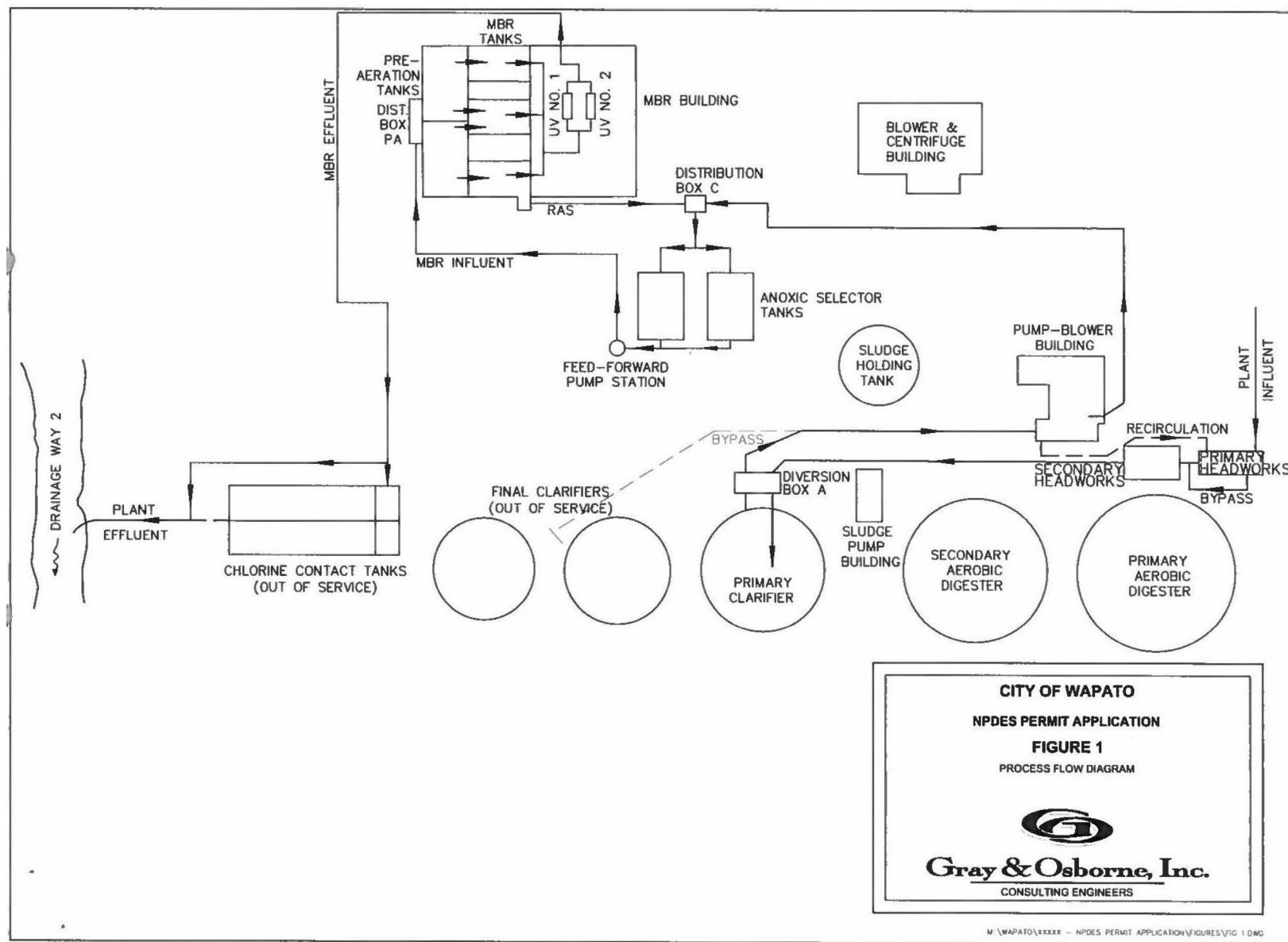


Figure 4 Process Flow Diagram

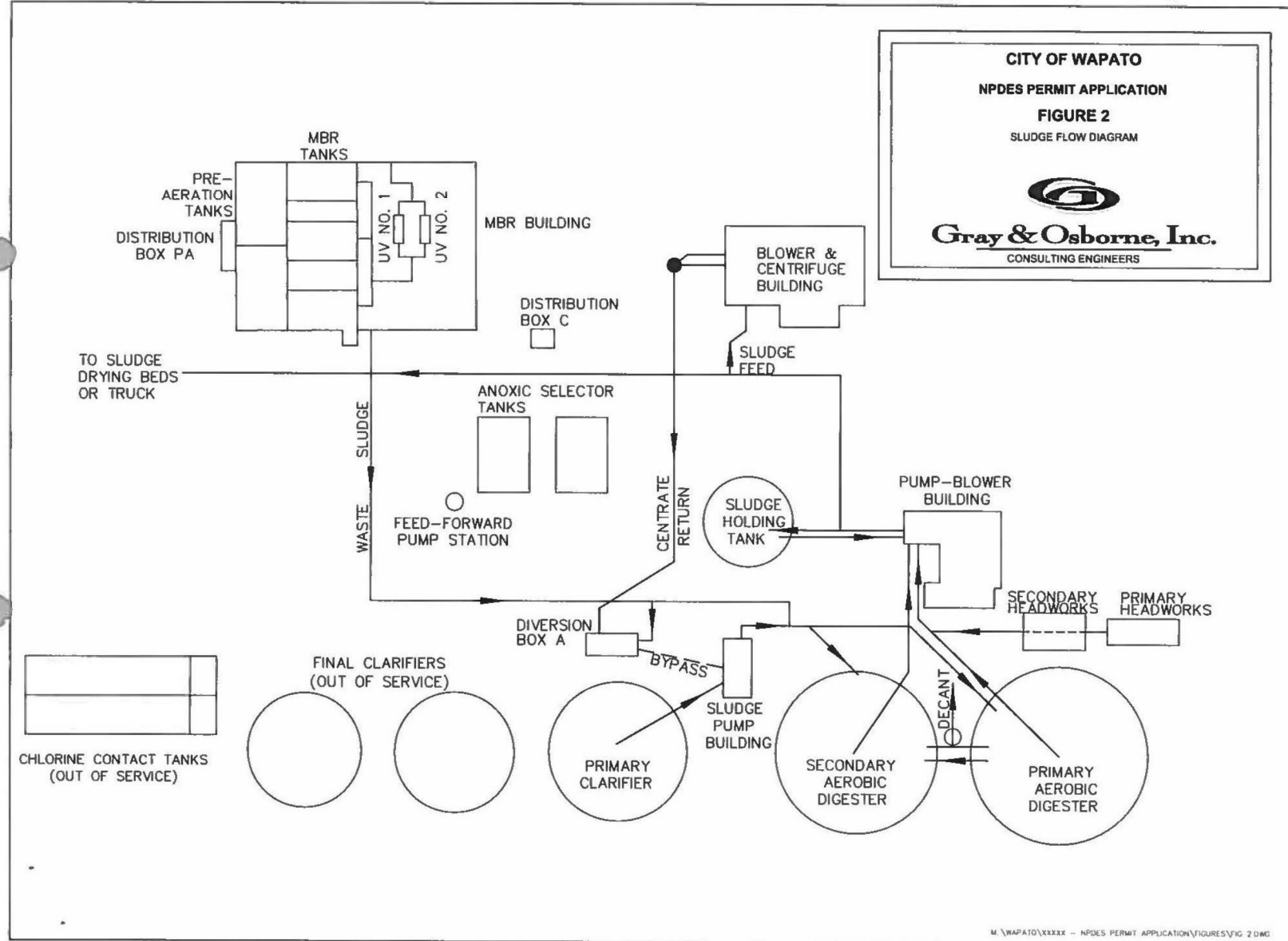


Figure 5 Sludge Flow Diagram

ATTACHMENT B – Photograph Log

(Photographs were taken by Rick Cool with a Panasonic Lumix FH-25 camera)

**Wapato Wastewater Treatment Plant
Wapato, Washington**

**NPDES Inspection June 18, 2024
Photographed by: Rick Cool**



Photo 1: P1010603

06/18/2024

Headworks



Photo 2: P1010604

06/18/2024

Influent Screens



Photo 3: P1010605

06/18/2024

Primary Clarifier



Photo 4: P1010606

06/18/2024

Sludge Drying Beds & Stockpiled Dried Sludge

**Wapato Wastewater Treatment Plant
Wapato, Washington**

**NPDES Inspection June 18, 2024
Photographed by: Rick Cool**



Photo 5: P1010607

06/18/2024

An MBR Pre-Aeration Basin



Photo 6: P1010608

06/18/2024

UV Disinfection Units



Photo 7: P1010609

06/18/2024

Drainageway #2 Upstream Sampling Location – Flow Gage/Fence Post Anchored Near Concrete Wall in Drainage Way Bank near Footbridge



Photo 8: P1010610

06/18/2024

Effluent Auto-Sampler

ATTACHMENT C – EPA ICIS Violations Report

NPDES ID(s): WA0050229
State: WA
Major/Minor Indicator:
Violation Date: 03/01/2020 - 05/31/2024
Violation Type(s):

Environmental Protection Agency
Integrated Compliance Information System
Violations Report

Created Date: 09/15/2010
Refresh Date: 06/10/2024
Report Version 1.5, Modified: 1/4/2017

WA0050229

Permittee Name:	WAPATO, CITY OF	Primary SIC Code:	4952	Permit Issued:	07/26/2023
Permittee Address:	68172 HIGHWAY 97 WAPATO, WA 98951	Primary SIC Desc:	Sewerage Systems	Permit Effective:	10/01/2023
Major/Minor Indicator:	Major	Primary NAICS Code:	221320	Permit Expired:	09/30/2028
Compliance Track. Status:	On	Primary NAICS Desc:	Sewage Treatment Facilities	Permit Status:	Effective
DMR Non Receipt Flag:	On	Cognizant Official:	JEFF SCHUMACKER, LEAD OPERATOR		
RNC Tracking Flag:	On	Cognizant Offcl. Ph.:	509-853-8013		
		Receiving Body:	YAKIMA RIVER VIA DRAINAGE DITCH #2		

Facility Information

Facility Name:	WAPATO, CITY OF - WAPATO WWTP	County:	Yakima	FRS ID:	110009763461
Facility Location:	68172 HIGHWAY 97 (YAKAMA RESERVATION) WAPATO, WA 98951	Region:	10	Federal Facility Ownership:	N
		State-Region:	07	Type of Ownership:	Municipality

DMR Non-Receipt Violations

Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	DMR Value	NODI Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Rec Date
D90	08/31/2020	09/10/2020	001-A	50060 - Chlorine, total residual	1	0	Q1	**8**	N 10/11/2020	0 10/11/2021	09/18/2020
D90	08/31/2020	09/10/2020	001-A	50060 - Chlorine, total residual	1	0	Q2	**8**	K 10/11/2020	0 10/11/2021	09/18/2020
D90	08/31/2020	09/10/2020	001-A	50060 - Chlorine, total residual	1	0	C2	**8**	N 10/11/2020	0 10/11/2021	09/18/2020
D90	08/31/2020	09/10/2020	001-A	50060 - Chlorine, total residual	1	0	C3	**8**	K 10/11/2020	0 10/11/2021	09/18/2020
D90	07/31/2020	08/10/2020	001-A	50060 - Chlorine, total residual	1	0	Q1	**8**	N 09/10/2020	0 09/10/2021	08/20/2020
D90	07/31/2020	08/10/2020	001-A	50060 - Chlorine, total residual	1	0	Q2	**8**	K 09/10/2020	0 09/10/2021	08/20/2020
D90	07/31/2020	08/10/2020	001-A	50060 - Chlorine, total residual	1	0	C2	**8**	N 09/10/2020	0 09/10/2021	08/20/2020
D90	07/31/2020	08/10/2020	001-A	50060 - Chlorine, total residual	1	0	C3	**8**	K 09/10/2020	0 09/10/2021	08/20/2020
D90	06/30/2020	07/10/2020	001-A	50060 - Chlorine, total residual	1	0	Q1	**8**	N 08/10/2020	0 08/10/2021	07/20/2020
D90	06/30/2020	07/10/2020	001-A	50060 - Chlorine, total residual	1	0	Q2	**8**	K 08/10/2020	0 08/10/2021	07/20/2020

NPDES ID(s): WA0050229
State: WA
Major/Minor Indicator:
Violation Date: 03/01/2020 - 05/31/2024
Violation Type(s):

Environmental Protection Agency
Integrated Compliance Information System
Violations Report

Created Date: 09/15/2010
Refresh Date: 06/10/2024
Report Version 1.5, Modified: 1/4/2017

WA0050229

DMR Non-Receipt Violations

Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	DMR Value	NODI Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Rec Date
D90	06/30/2020	07/10/2020	001-A	50060 - Chlorine, total residual	1	0	C2	**8**	N 08/10/2020	0 08/10/2021	07/20/2020
D90	06/30/2020	07/10/2020	001-A	50060 - Chlorine, total residual	1	0	C3	**8**	K 08/10/2020	0 08/10/2021	07/20/2020
D90	05/31/2020	06/10/2020	001-A	50060 - Chlorine, total residual	1	0	Q1	**8**	N 07/11/2020	0 07/11/2021	06/20/2020
D90	05/31/2020	06/10/2020	001-A	50060 - Chlorine, total residual	1	0	Q2	**8**	K 07/11/2020	0 07/11/2021	06/20/2020
D90	05/31/2020	06/10/2020	001-A	50060 - Chlorine, total residual	1	0	C2	**8**	N 07/11/2020	0 07/11/2021	06/20/2020
D90	05/31/2020	06/10/2020	001-A	50060 - Chlorine, total residual	1	0	C3	**8**	K 07/11/2020	0 07/11/2021	06/20/2020
D90	04/30/2020	05/10/2020	001-A	50060 - Chlorine, total residual	1	0	Q1	**8**	N 06/10/2020	0 06/10/2021	05/19/2020
D90	04/30/2020	05/10/2020	001-A	50060 - Chlorine, total residual	1	0	Q2	**8**	K 06/10/2020	0 06/10/2021	05/19/2020
D90	04/30/2020	05/10/2020	001-A	50060 - Chlorine, total residual	1	0	C2	**8**	N 06/10/2020	0 06/10/2021	05/19/2020
D90	04/30/2020	05/10/2020	001-A	50060 - Chlorine, total residual	1	0	C3	**8**	K 06/10/2020	0 06/10/2021	05/19/2020
D90	03/31/2020	04/10/2020	001-A	50060 - Chlorine, total residual	1	0	Q1	**8**	N 05/11/2020	0 05/11/2021	04/20/2020
D90	03/31/2020	04/10/2020	001-A	50060 - Chlorine, total residual	1	0	Q2	**8**	K 05/11/2020	0 05/11/2021	04/20/2020
D90	03/31/2020	04/10/2020	001-A	50060 - Chlorine, total residual	1	0	C2	**8**	N 05/11/2020	0 05/11/2021	04/20/2020
D90	03/31/2020	04/10/2020	001-A	50060 - Chlorine, total residual	1	0	C3	**8**	K 05/11/2020	0 05/11/2021	04/20/2020

Effluent Violations

Violation Code	Monitoring Period End Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	SNC Group	EA Identifier	Value Type/ Stat. Base	Reported Value/Units	% Exceed.	Limit Value/ Units	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
E90	04/30/2024	001-A	00610 - Nitrogen, ammonia total [as N]	1	1	1		Q1 MO AVG	72.5 lb/d	936%	<=7 lb/d		

NPDES ID(s): WA0050229
State: WA
Major/Minor Indicator:
Violation Date: 03/01/2020 - 05/31/2024
Violation Type(s):

Environmental Protection Agency
Integrated Compliance Information System
Violations Report

Created Date: 09/15/2010
Refresh Date: 06/10/2024
Report Version 1.5, Modified: 1/4/2017

WA0050229

Effluent Violations

Violation Code	Monitoring Period End Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	SNC Group	EA Identifier	Value Type/ Stat. Base	Reported Value/Units	% Exceed.	Limit Value/ Units	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
E90	04/30/2024	001-A	00610 - Nitrogen, ammonia total [as N]	1	1	1		Q2 DAILY MX	87.7 lb/d	251%	<=25 lb/d		
E90	04/30/2024	001-A	00610 - Nitrogen, ammonia total [as N]	1	1	1		C2 MO AVG	15.9 mg/l	2,171%	<=,7 mg/l		
E90	04/30/2024	001-A	00610 - Nitrogen, ammonia total [as N]	1	1	1		C3 DAILY MX	17.1 mg/l	558%	<=2.6 mg/l		
E90	04/30/2024	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.28 lb/d	17%	<=,24 lb/d		
E90	04/30/2024	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	55 ug/l	120%	<=25 ug/l		
E90	04/30/2024	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	55 ug/l	6%	<=52 ug/l		
E90	03/31/2024	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.625 lb/d	160%	<=,24 lb/d	T 03/31/2024	1 03/31/2024
E90	03/31/2024	001-A	01094 - Zinc, total recoverable	1	0	2		Q2 DAILY MX	1,5 lb/d	200%	<=,5 lb/d		
E90	03/31/2024	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	65 ug/l	160%	<=25 ug/l	T 03/31/2024	1 03/31/2024
E90	03/31/2024	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	347 ug/l	567%	<=52 ug/l		
E90	02/29/2024	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.25 lb/d	4%	<=,24 lb/d	V 02/29/2024	1 02/29/2024
E90	02/29/2024	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	48 ug/l	92%	<=25 ug/l	T 02/29/2024	1 02/29/2024
E90	02/29/2024	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	70 ug/l	35%	<=52 ug/l		
E90	01/31/2024	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.25 lb/d	4%	<=,24 lb/d	V 01/31/2024	1 01/31/2024
E90	01/31/2024	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	63,5 ug/l	154%	<=25 ug/l	T 01/31/2024	1 01/31/2024
E90	01/31/2024	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	80 ug/l	54%	<=52 ug/l		
E90	12/31/2023	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	49 ug/l	96%	<=25 ug/l	T 12/31/2023	1 12/31/2023

DMR Non-Receipt Violations: Asterisks around a NODI Code (e.g, **X**) indicate the NODI code will not automatically resolve RNC.
Schedule Violations: Schedule Type P - Permit, A - Administrative, J - Judicial

NPDES ID(s): WA0050229
State: WA
Major/Minor Indicator:
Violation Date: 03/01/2020 - 05/31/2024
Violation Type(s):

Environmental Protection Agency
Integrated Compliance Information System
Violations Report

Created Date: 09/15/2010
Refresh Date: 06/10/2024
Report Version 1.5, Modified: 1/4/2017

WA0050229													
Effluent Violations													
Violation Code	Monitoring Period End Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	SNC Group	EA Identifier	Value Type/ Stat. Base	Reported Value/Units	% Exceed.	Limit Value/ Units	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
E90	09/30/2023	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	1.36 lb/d	467%	<=.24 lb/d	T 09/30/2023	1 09/30/2023
E90	09/30/2023	001-A	01094 - Zinc, total recoverable	1	0	2		Q2 DAILY MX	4.1 lb/d	720%	<=.5 lb/d		
E90	09/30/2023	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	63.9 ug/l	23%	<=52 ug/l		
E90	09/30/2023	001-A	01119 - Copper, total recoverable	1	0	2		Q1 MO AVG	.066 lb/d	100%	<=.033 lb/d		
E90	09/30/2023	001-A	01119 - Copper, total recoverable	1	0	2		Q2 DAILY MX	.2 lb/d	277%	<=.053 lb/d		
E90	04/30/2023	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.25 lb/d	4%	<=.24 lb/d	V 04/30/2023	2 10/31/2023
E90	04/30/2023	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	55 ug/l	120%	<=25 ug/l	T 04/30/2023	2 10/31/2023
E90	04/30/2023	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	100 ug/l	92%	<=52 ug/l		
E90	03/31/2023	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	46.3 ug/l	85%	<=25 ug/l	T 03/31/2023	2 10/31/2023
E90	03/31/2023	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	65 ug/l	25%	<=52 ug/l		
E90	02/28/2023	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	75.5 ug/l	202%	<=25 ug/l	T 02/28/2023	2 10/31/2023
E90	02/28/2023	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	100 ug/l	92%	<=52 ug/l		
E90	02/28/2023	001-A	01119 - Copper, total recoverable	1	0	2		C2 MO AVG	4.8 ug/l	41%	<=3.4 ug/l	T 02/28/2023	2 06/30/2023
E90	01/31/2023	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	32.8 ug/l	31%	<=25 ug/l	T 01/31/2023	2 10/31/2023
E90	12/31/2022	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	45.4 ug/l	82%	<=25 ug/l	T 12/31/2022	2 10/31/2023
E90	12/31/2022	001-A	01119 - Copper, total recoverable	1	0	2		C2 MO AVG	4.19 ug/l	23%	<=3.4 ug/l	T 12/31/2022	2 06/30/2023
E90	12/31/2022	001-A	01119 - Copper, total recoverable	1	0	2		C3 DAILY MX	6.3 ug/l	15%	<=5.5 ug/l		
E90	11/30/2022	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	38.7 ug/l	55%	<=25 ug/l	T 11/30/2022	2 10/31/2023

NPDES ID(s): WA0050229
State: WA
Major/Minor Indicator:
Violation Date: 03/01/2020 - 05/31/2024
Violation Type(s):

Environmental Protection Agency
Integrated Compliance Information System
Violations Report

Created Date: 09/15/2010
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WA0050229

Effluent Violations

Violation Code	Monitoring Period End Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	SNC Group	EA Identifier	Value Type/ Stat. Base	Reported Value/Units	% Exceed.	Limit Value/ Units	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
E90	11/30/2022	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	62 ug/l	19%	<=52 ug/l		
E90	10/31/2022	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	31.6 ug/l	26%	<=25 ug/l	T 10/31/2022	2 10/31/2023
E90	10/31/2022	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	54 ug/l	4%	<=52 ug/l		
E90	09/30/2022	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	1.1 lb/d	358%	<=,24 lb/d	T 09/30/2022	2 10/31/2023
E90	09/30/2022	001-A	01094 - Zinc, total recoverable	1	0	2		Q2 DAILY MX	2.3 lb/d	360%	<=,5 lb/d		
E90	08/31/2022	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	1.7 lb/d	608%	<=,24 lb/d	T 08/31/2022	2 10/31/2023
E90	08/31/2022	001-A	01094 - Zinc, total recoverable	1	0	2		Q2 DAILY MX	2.4 lb/d	380%	<=,5 lb/d		
E90	08/31/2022	001-A	01119 - Copper, total recoverable	1	0	2		Q1 MO AVG	.04 lb/d	21%	<=,033 lb/d	T 12/31/2022	2 06/30/2023
E90	08/31/2022	001-A	01119 - Copper, total recoverable	1	0	2		C2 MO AVG	5 ug/l	47%	<=3,4 ug/l	T 12/31/2022	2 06/30/2023
E90	07/31/2022	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.317 lb/d	32%	<=,24 lb/d	T 07/31/2022	2 10/31/2023
E90	07/31/2022	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	47.8 ug/l	91%	<=25 ug/l	T 07/31/2022	2 10/31/2023
E90	06/30/2022	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	41.45 ug/l	66%	<=25 ug/l	T 06/30/2022	2 10/31/2023
E90	06/30/2022	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	59 ug/l	13%	<=52 ug/l		
E90	05/31/2022	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.25 lb/d	4%	<=,24 lb/d	V 05/31/2022	2 10/31/2023
E90	05/31/2022	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	42.9 ug/l	72%	<=25 ug/l	T 05/31/2022	2 10/31/2023
E90	05/31/2022	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	53.4 ug/l	3%	<=52 ug/l		
E90	04/30/2022	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.26 lb/d	8%	<=,24 lb/d	V 04/30/2022	2 10/31/2023
E90	04/30/2022	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	45.6 ug/l	82%	<=25 ug/l	T 04/30/2022	2 10/31/2023

NPDES ID(s): WA0050229
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E90	04/30/2022	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	55 ug/l	6%	<=52 ug/l		
E90	03/31/2022	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	54.9 ug/l	120%	<=25 ug/l	T 03/31/2022	2 10/31/2023
E90	03/31/2022	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	82.6 ug/l	59%	<=52 ug/l		
E90	02/28/2022	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	50.25 ug/l	101%	<=25 ug/l	T 02/28/2022	2 10/31/2023
E90	02/28/2022	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	60 ug/l	15%	<=52 ug/l		
E90	01/31/2022	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	50 ug/l	100%	<=25 ug/l	T 01/31/2022	2 10/31/2023
E90	12/31/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	45.06 ug/l	80%	<=25 ug/l	T 12/31/2021	2 10/31/2023
E90	11/30/2021	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.25 lb/d	4%	<= .24 lb/d	V 11/30/2021	2 10/31/2023
E90	11/30/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	55 ug/l	120%	<=25 ug/l	T 11/30/2021	2 10/31/2023
E90	11/30/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	69 ug/l	33%	<=52 ug/l		
E90	10/31/2021	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.29 lb/d	21%	<= .24 lb/d	T 10/31/2021	2 10/31/2023
E90	10/31/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	56.5 ug/l	126%	<=25 ug/l	T 10/31/2021	2 10/31/2023
E90	10/31/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	75.5 ug/l	45%	<=52 ug/l		
E90	09/30/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	44.34 ug/l	77%	<=25 ug/l	T 09/30/2021	2 10/31/2023
E90	09/30/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	62.5 ug/l	20%	<=52 ug/l		
E90	08/31/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	34 ug/l	36%	<=25 ug/l	T 08/31/2021	2 10/31/2023
E90	07/31/2021	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.3 lb/d	25%	<= .24 lb/d	T 07/31/2021	2 10/31/2023
E90	07/31/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	52.6 ug/l	110%	<=25 ug/l	T 07/31/2021	2 10/31/2023

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E90	07/31/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	62 ug/l	19%	<=52 ug/l		
E90	06/30/2021	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.25 lb/d	4%	<=,24 lb/d	V 06/30/2021	2 10/31/2023
E90	06/30/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	49.6 ug/l	98%	<=25 ug/l	T 06/30/2021	2 10/31/2023
E90	06/30/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	56.5 ug/l	9%	<=52 ug/l		
E90	05/31/2021	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.35 lb/d	46%	<=,24 lb/d	T 05/31/2021	2 10/31/2023
E90	05/31/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	67 ug/l	168%	<=25 ug/l	T 05/31/2021	2 10/31/2023
E90	05/31/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	81 ug/l	56%	<=52 ug/l		
E90	04/30/2021	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.47 lb/d	96%	<=,24 lb/d	T 04/30/2021	2 10/31/2023
E90	04/30/2021	001-A	01094 - Zinc, total recoverable	1	0	2		Q2 DAILY MX	.6 lb/d	20%	<=,5 lb/d		
E90	04/30/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	96 ug/l	284%	<=25 ug/l	T 04/30/2021	2 10/31/2023
E90	04/30/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	128 ug/l	146%	<=52 ug/l		
E90	03/31/2021	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.275 lb/d	15%	<=,24 lb/d	V 03/31/2021	2 10/31/2023
E90	03/31/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	56.7 ug/l	127%	<=25 ug/l	T 03/31/2021	2 10/31/2023
E90	03/31/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	64 ug/l	23%	<=52 ug/l		
E90	02/28/2021	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.29 lb/d	21%	<=,24 lb/d	T 02/28/2021	2 10/31/2023
E90	02/28/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	61.25 ug/l	145%	<=25 ug/l	T 02/28/2021	2 10/31/2023
E90	02/28/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	74 ug/l	42%	<=52 ug/l		
E90	01/31/2021	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.325 lb/d	35%	<=,24 lb/d	T 01/31/2021	2 10/31/2023

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E90	01/31/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	82.6 ug/l	230%	<=25 ug/l	T 01/31/2021	2 10/31/2023
E90	01/31/2021	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	94.5 ug/l	82%	<=52 ug/l		
E90	12/31/2020	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.36 lb/d	50%	<=.24 lb/d	T 12/31/2020	2 10/31/2023
E90	12/31/2020	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	90.1 ug/l	260%	<=25 ug/l	T 12/31/2020	2 10/31/2023
E90	12/31/2020	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	124 ug/l	138%	<=52 ug/l		
E90	11/30/2020	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.3 lb/d	25%	<=.24 lb/d	T 11/30/2020	2 10/31/2023
E90	11/30/2020	001-A	01094 - Zinc, total recoverable	1	0	2		Q2 DAILY MX	.57 lb/d	14%	<=.5 lb/d		
E90	11/30/2020	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	74.1 ug/l	196%	<=25 ug/l	T 11/30/2020	2 10/31/2023
E90	11/30/2020	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	120 ug/l	131%	<=52 ug/l		
E90	10/31/2020	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.3 lb/d	25%	<=.24 lb/d	T 10/31/2020	2 10/31/2023
E90	10/31/2020	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	45.8 ug/l	83%	<=25 ug/l	T 10/31/2020	2 10/31/2023
E90	09/30/2020	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.25 lb/d	4%	<=.24 lb/d	V 09/30/2020	2 10/31/2023
E90	09/30/2020	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	30.7 ug/l	23%	<=25 ug/l	T 09/30/2020	2 10/31/2023
E90	08/31/2020	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.33 lb/d	38%	<=.24 lb/d	T 08/31/2020	2 10/31/2023
E90	08/31/2020	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	42.1 ug/l	68%	<=25 ug/l	T 08/31/2020	2 10/31/2023
E90	08/31/2020	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	58.5 ug/l	13%	<=52 ug/l		
E90	07/31/2020	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.29 lb/d	21%	<=.24 lb/d	T 07/31/2020	2 10/31/2023
E90	07/31/2020	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	48.16 ug/l	93%	<=25 ug/l	T 07/31/2020	2 10/31/2023

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Violation Code	Monitoring Period End Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	SNC Group	EA Identifier	Value Type/ Stat. Base	Reported Value/Units	% Exceed.	Limit Value/ Units	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
E90	07/31/2020	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	54 ug/l	4%	<=52 ug/l		
E90	06/30/2020	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.27 lb/d	13%	<= .24 lb/d	V 06/30/2020	2 10/31/2023
E90	06/30/2020	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	49.3 ug/l	97%	<=25 ug/l	T 06/30/2020	2 10/31/2023
E90	06/30/2020	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	62.5 ug/l	20%	<=52 ug/l		
E90	05/31/2020	001-A	01094 - Zinc, total recoverable	1	0	2		Q1 MO AVG	.25 lb/d	4%	<= .24 lb/d	V 05/31/2020	2 10/31/2023
E90	05/31/2020	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	49.4 ug/l	98%	<=25 ug/l	T 05/31/2020	2 10/31/2023
E90	05/31/2020	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	54.5 ug/l	5%	<=52 ug/l		
E90	04/30/2020	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	41.64 ug/l	67%	<=25 ug/l	T 04/30/2020	2 10/31/2023
E90	04/30/2020	001-A	01094 - Zinc, total recoverable	1	0	2		C3 DAILY MX	53.5 ug/l	3%	<=52 ug/l		
E90	03/31/2020	001-A	01094 - Zinc, total recoverable	1	0	2		C2 MO AVG	48.96 ug/l	96%	<=25 ug/l	T 03/31/2020	2 10/31/2023
Schedule Violations													
Violation Code	Sch. Event Code	Schedule Date	Actual Date	Report Received Date	EA Identifier	Sch. Num.	Sch. Type	Schedule Event/ Comments			RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	
C40	ERPNP	03/29/2024				1	P	Emergency Response and Public Notification Plan Comment: The permittee must develop and implement an overflow emergency response and public notification plan. The permittee must submit written notice to EPA and the Yakama Nation that the plan has been developed and implemented (See Part II.F of this permit).			N 04/29/2024	1 04/29/2024	

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RNC Detection Codes

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Violation Type	RNC Detection Code	RNC Detection Description
DMR Non-Receipt (D80, D90)	K	RPT - Non-receipt Violation, Non-Monthly Average
	N	RPT - Non-Receipt of DMR/Schedule Report
Effluent (E90)	A	ENF - Enforcement Order
	C	CHR - Chronic Violation
	H	CHR - Chronic Violation, Non-Monthly Average
	P	ENF - Enforcement Order, Non-Monthly Average
	R	TRC - TRC Limitations Exceeded, Non-Monthly Average
	T	TRC - TRC Limitations Exceeded
	U	EFF - Other Violation with TRC Non-Monthly Average
	V	EFF - Other Violation with TRC
	X	EFF - Manual Other Violation with TRC
	Y	TRC - Manual TRC
	Z	CHR - Manual Chronic
Schedule Violations (C10, C20, C30, C40)	N	SCH - Non-Receipt of DMR/Schedule Report
	S	SCH - Schedule Violation
Single Event	B	DIS - Manual 2A4 - Pass-Through
	D	DIS - Manual Other
	E	DIS - Manual 2F - Permit Narrative
	F	DIS - Manual 2G - Violation of Concern
	G	DIS - Manual 2A1 - Effluent Violation
	I	DIS - Manual 2A2 - Unauthorized Bypass
	J	DIS - Manual 2A3 - Unpermitted Discharge
	Q	DIS - Manual 2B - Pretreatment
	W	DIS - Manual 2E - Deficient Report

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RNC Resolution Codes

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RNC Resolution Status	RNC Resolution Code	RNC Resolution Description
Noncompliant (NC)	1	NC - Unresolved RNC
	A	NC - Manual Unresolved RNC
Resolved Pending (RP)	3	RP - Due to Formal Enforcement Action Final Order with Compliance Schedule
	4	RP - In Compliance with Formal Enforcement Action Final Order Requirement
	7	RP - Manual RP - In Compliance with Formal Enforcement Action Order Requirement
	8	RP - Manual Due to Formal Enforcement Action Formal Order
Resolved (RE)	0	RE - Automated Administratively Resolved (DMR Non-Receipt Violations)
	2	RE - Back into Compliance
	5	RE - Resolved RP by NPDES Closure of Enf. Action Final Order with Comp. Schedule
	6	RE - Manual Resolution by Enforcement Action
	9	RE - Manual by Back into Compliance/Administratively Resolved
	B	RE - Manual by EPA/State/Tribal Action

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NODI Codes

NODI Code	Acceptable?	NODI Description
2	Y	Operation Shutdown
3	Y	Special Report Attached
6	N	State-specific No Data Indicator - Invalid
7	Y	No Influent
9	Y	Conditional Monitoring - Not Required This Period
A	Y	General Permit Exemption
B	Y	Below Detection Limit/No Detection
C	Y	No Discharge
E	N	Failed to Sample/Required Analysis Not Conducted
F	Y	Insufficient Flow for Sampling
I	Y	Land Applied
N	Y	Not Constructed
P	N	Laboratory Error or Invalid Test
Q	Y	Not Quantifiable
R	Y	Administratively Resolved
T	Y	Environmental Conditions - Monitoring Not Possible
W	Y	Dry Lysimeter/Well
X	N	Parameter/Value Not Reported
Y	Y	State-specific No Data Indicator - Valid

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DMR Violation Codes

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Violation	Violation Code	Violation Indicator Type
DMR Non-Receipt Violation	D80	DMR, Monitor Only - Overdue
	D90	DMR, Limited - Overdue
Effluent Violation	E90	DMR, Limited - Numeric Violation

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Schedule Violation Codes

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Violation	Violation Code	Violation Indicator Type
Schedule Violation	C10	Schedule Event reported late
	C20	Schedule Event achieved late but reported
	C30	Schedule Event unachieved but reported
	C40	Schedule Event unachieved and not reported

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Monitoring Location Codes

Monitoring Location Codes	Monitoring Location Description
0	Intake
1	Effluent Gross
2	Effluent Net
3	Intake Public Water
4	Pretreatment, Process Complete
5	Upstream Monitoring
6	Downstream Monitoring
7	Intake from Stream
8	Other Treatment, Process Complete
9	Phosphate Removal, Process Complete
A	Disinfection, Process Complete
AP	Alternate Process
B	Prior to Disinfection
C	Nitrogen, Removal Complete
CA	Calculated Adjusted
D	Tertiary/Advanced Process Complete
E	Secondary/Biological Process Complete
E1	Effluent Option 1
E2	Effluent Option 2
E3	Effluent Option 3
EA	Effluent Adjusted Value
ED	Effluent w/additives
EG	Effluent Gross
F	Primary/Preliminary Process Complete
G	Raw Sewage Influent
GW	Groundwater
H	During Manufacturing
I	Intake from Well
II	Industrial Influent
IM	Internal Monitoring Point
IN	Allowed Increase
J	Intermediate Treatment, Process Complete
K	Percent Removal
L	Digester
LA	Land Application Soil
N	In Aeration Unit
O	See Comments
P	See Comments
PI	Prior to Irrigation
PR	Prior to Reuse
PT	Precipitation
Q	See Comments
R	See Comments
RS	Beneficial Reuse
RW	Receiving Water
S	See Comments
SC	See Comments
SD	Sediment
SL	Sludge
SW	Storm Water
T	See Comments
U	See Comments
V	See Comments

Environmental Protection Agency
Integrated Compliance Information System
Violations Report

Created Date: 09/15/2010
Refresh Date: 06/10/2024
Report Version 1.5, Modified: 1/4/2017

Monitoring Location Codes

Monitoring Location Codes	Monitoring Location Description
W	See Comments
X	End of Chlorine Contact Chamber
Y	Effluent Gross (Supplementary)
Z	Instream Monitoring

ATTACHMENT D – DOI Geological Survey Rating Table

UNITED STATES DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY (WATER RESOURCES BRANCH)File No. _____
Field _____

Rating table for

DRAIN 2 WAPATO SANITATION OUTLET Dated MARCH 14, 1988

from _____ to _____; from _____ to _____
from _____ to _____; from _____ to _____

mGD	Stage Height											Discharge
		.00	.01	.02	.03	.04	.05	.06	.07	.08	.09	
11.633	0	18	18.2	18.4	18.6	18.8	19	19.2	19.4	19.6	19.8	2
12.925	1	20	20.25	20.5	20.75	21	21.25	21.5	21.75	22	22.25	2.5
14.541	2	22.5	22.8	23.1	23.4	23.7	24	24.3	24.6	24.9	25.2	3
16.479	3	25.5	25.8	26.1	26.4	26.7	27	27.3	27.6	27.9	28.2	3
18.418	4	28.5	28.9	29.3	29.7	30.1	30.5	30.9	31.3	31.7	32.1	4
21.004	5	32.5	33.1	33.7	34.3	34.9	35.5	36.1	36.7	37.3	37.9	6
24.881	6	38.5	39.1	39.7	40.3	40.9	41.5	42.1	42.7	43.3	43.9	6
28.759	7	44.5	45.2	45.9	46.6	47.3	48	48.7	49.4	50.1	50.8	7
33.283	8	51.5	52.3	53.1	53.9	54.7	55.5	56.3	57.1	57.9	58.7	8
38.453	9	59.5	60.35	61.2	62.05	62.9	63.75	64.6	65.45	66.3	67.15	8.5
43.946	10	68	68.9	69.8	70.7	71.6	72.5	73.4	74.3	75.2	76.1	9
49.762	11	77	78	79	80	81	82	83	84	85	86	10
56.225	12	87	88.1	89.2	90.3	91.4	92.5	93.6	94.7	95.8	96.9	11
63.334	13	98	99.2	100.4	101.6	102.8	104	105.2	106.4	107.6	108.8	12
71.089	14	110	111.4	112.8	114.2	115.6	117	118.4	119.8	121.2	122.6	14
80.137	15	124	125.6	127.2	128.8	130.4	132	133.6	135.2	136.8	138.4	16
90.478	16	140	141.9	143.8	145.7	147.6	149.5	151.4	153.3	155.2	157.1	19
115.601	17	159	161.1	163.2	165.3	167.4	169.5	171.6	173.7	175.8	177.9	21
146.328	18	180	182.5	185	187.5	190	192.5	195	197.5	200	202.5	25
182.485	19	205	207.9	210.8	213.7	216.6	219.5	222.4	225.3	228.2	231.8	29
51.224	20	234										
	21											
	22											
	23											
	24											
	25											
	26											
	27											
	28											
	29											

Computed by UL 3.14.1988: Checked by _____ 19.88 Remarks _____

5154171

@ 6/18/2024

**ATTACHMENT E – Anateck Labs, Inc. December 2023 Lab Report Excerpt
(PFAS)**

Anatek Labs, Inc.

1282 Alturas Drive - Moscow, ID 83843 - (208) 883-2839 - email moscow@anateklabs.com
504 E Sprague Ste. D - Spokane, WA 99202 - (509) 838-3999 - email spokane@anateklabs.com

12/18/24

Client: Labtest
Address: 201 East D St
Yakima, WA 98901
Attn: Bennett Osborne

Work Order: MDL0299
Project: 12848
Reported: 12/28/2023 15:36

Analytical Results Report

System ID#
Reference Number: MDL0299-01
Multiple Source Nos:
Date Received: 12/08/23 09:30
Sample Location: 12848
Matrix: Drinking Water

System Name: Labtest
Collect Date: 12/06/23 00:00
Sample Type:
Sample Purpose:

DOH Source #:
County:

Lab/Sample Number: 125-29901

Per- and Polyfluoroalkyl Substances (PFAS)

DOH #	Analyte	Result	Units	LRL	SDRL	SAL	MCL	Analyzed	Analyst	Method	Qualifier
0434	PFOA Perfluorooctanoic acid	2.54	ng/L	2.00	2	10		12/14/23 5:13	MER	EPA 533	
0433	PFOS Perfluorooctanesulfonic acid	14.1	ng/L	2.00	2	15		12/14/23 5:13	MER	EPA 533	
0431	PFHxS Perfluorohexanesulfonic acid	ND	ng/L	2.00	2	65		12/14/23 5:13	MER	EPA 533	
0432	PFNA Perfluorononanoic acid	ND	ng/L	2.00	2	9		12/14/23 5:13	MER	EPA 533	
0429	PFBS Perfluorobutanesulfonic acid	ND	ng/L	2.00	2	345		12/14/23 5:13	MER	EPA 533	
0430	PFHpA Perfluoroheptanoic acid	ND	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0435	PFHxA Perfluorohexanoic acid	8.45	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0436	PFDA Perfluorodecanoic acid	ND	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0437	PFUnA Perfluoroundecanoic acid	ND	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0438	PFDoA Perfluorododecanoic acid	ND	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0445	ADONA 4,8-Dioxa-3H-perfluorononanoic acid	ND	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0446	9CI-PF3ONS	ND	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0447	HFPO-DA Hexafluoropropylene oxide dimer acid	ND	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0448	11CI-PF3OUdS	ND	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0450	4:2FTS 1H,1H,2H,2H-Perfluorohexane sulfonic acid	ND	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0451	6:2FTS 1H,1H,2H,2H-Perfluorooctane sulfonic acid	ND	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0452	8:2FTS 1H,1H,2H,2H-Perfluorodecane sulfonic acid	ND	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0453	NFDHA Nonafluoro-3,6-dioxaheptanoic acid	ND	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0454	PFBA Perfluorobutanoic acid	3.33	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	

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@ 6/18/24

Client: Labtest
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Attn: Bennett Osborne

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Reported: 12/28/2023 15:36

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System Name: Labtest
Collect Date: 12/06/23 00:00
Sample Type:
Sample Purpose:

DOH Source #:
County:

Lab/Sample Number: 125-29901

Per- and Polyfluoroalkyl Substances (PFAS)

DOH #	Analyte	Result	Units	LRL	SDRL	SAL	MCL	Analyzed	Analyst	Method	Qualifier
0455	PFHpS Perfluoroheptanesulfonic acid	ND	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0456	PFMBA Perfluoro-4-methoxybutan oic acid	ND	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0457	PFMPA Perfluoro-3-methoxypropa noic acid	ND	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0458	PFPeA Perfluoropentanoic acid	14.2	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0459	PFPeS Perfluoropentanesulfonic acid	ND	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	
0460	PFEESA Perfluoro(2-ethoxyethane) sulfonic acid	ND	ng/L	2.00	2	--		12/14/23 5:13	MER	EPA 533	