

# 2023 Annual Pretreatment Report





City of Wilsonville  
Public Works  
29799 SW Town Center Loop E.  
Wilsonville, Oregon 97070  
503-682-4092  
[www.ci.wilsonville.or.us/publicworks](http://www.ci.wilsonville.or.us/publicworks)

Prepared by:  
Steve Gering, Industrial Pretreatment Coordinator  
503-570-1551  
[gering@ci.wilsonville.or.us](mailto:gering@ci.wilsonville.or.us)

Reviewed by:  
Delora Kerber, Public Works Director  
503-570-1542  
[kerber@ci.wilsonville.or.us](mailto:kerber@ci.wilsonville.or.us)

# Industrial Pretreatment Program Report

## Summary

The City of Wilsonville is required to submit an annual report to the Department of Environmental Quality (DEQ) outlining the City's activities to implement its approved Industrial Pretreatment Program. This report is required by General Pretreatment Regulation 40 CFR (Code of Federal Regulation) 403.12(i) and Schedule E of the City's National Pollutant Discharge Elimination System (NPDES) permit #101888 for the Wastewater Treatment Plant.

The purpose of the annual report is to assist DEQ in determining whether approved pretreatment programs in the State of Oregon are properly implemented. The report format, required technical information, and guidance document were developed by DEQ to assist program coordinators in the preparation.

The following forms within the report provide required information on the implementation activities of the program:

### Form 1- Cover Sheet

General information on the City's publicly owned treatment works (POTW) such as address, phone number, name of pretreatment coordinator, and NPDES permit information. This form also requires a signature of the public official responsible for implementing the approved POTW pretreatment program. The signatory authorization is pursuant to 40 CFR 403.12(m).

### Form 2- Program Status and Update

Information on any proposed changes to the approved program procedures, modifications approved by DEQ in the calendar year, responses to pretreatment compliance inspections or audits, and noteworthy pretreatment activities accomplished in the calendar year.

### Form 3- Treatment Plant Monitoring

Summary of the wastewater treatment plant toxic and non-conventional pollutant monitoring data collected for the calendar year. Testing requirements for influent, effluent, and biosolids are contained in the NPDES permit issued to the Wastewater Treatment Plant.

### Form 4- Headworks Loading Comparison

Technical analysis to determine if any local limits need to be re-evaluated for water quality by comparing actual headworks loading to the current local limits. Analysis includes plant-monitoring information contained in *Form 3* to assess any exceedance in maximum allowable headworks loading (MAHL). Details must be provided for values that exceed 90% of the MAHL for any local limit.

### Form 5- Treatment Plant Upsets/Problems

Requires the City to identify all instances of treatment plant upsets that occurred in the calendar year as the direct or indirect result of a non-domestic discharge. Each event must be documented along with any actions taken to identify the source and prevent future occurrences.

### Form 6- List of Regulated Users

Lists all permitted industrial users (IU) regulated by the pretreatment program, as well as their respective Standard Industrial Classification (SIC) code(s), and applicable federal categorical standards. Includes all Significant Industrial Users (SIU) that discharge process wastewater, and all users subject to categorical

pretreatment standards (discharging or non-discharging) connected to the City POTW. Lists new non-domestic users of interest surveyed during the calendar year that may discharge process wastewater to the POTW. Form 6A identifies industries that may require an industrial wastewater discharge permit.

Form 7- Compliance/Oversight Summary (SIUs Only)

Summary of compliance activities performed by the City. The form includes permit expiration dates, monitoring activities conducted on each SIU (inspections, City-monitoring, and self-monitoring), as well as identify SIUs under Significant Non-Compliance (SNC) during any quarter during the calendar year.

Form 8- Noncompliance/Enforcement Summary (SIUs Only)

A summary of SIUs that violated any pretreatment standards or requirements. The summary identifies the SIU, date and nature of each violation, City enforcement action for each violation, and date the SIU returned to compliance.

Form 9- Resource Summary

Summarizes the resources (staffing and budget) dedicated to implementing its approved pretreatment program in the reported calendar year and the estimated resources for following year.

Form 10- Pretreatment Program Evaluation

Provides an overview of the City's performance efforts to implement its approved program. The questions cover all aspects of the program and provide DEQ with sufficient information to identify program deficiencies that may need review during DEQ's annual pretreatment compliance inspection (PCI) or program audit.

Form 11- Sewage Treatment Plant Profile(s)

Provides background information on the City's wastewater treatment system including plant flow, sewerage collection system, industrial contribution, receiving streams and biosolids disposal.

Form 12- Pretreatment Program Profile(s)

Provides information on inter-governmental agreements regarding implementation of the approved pretreatment program elements (permitting, monitoring, enforcement, etc.) in contributing jurisdictions.

Form 13- Pretreatment Data Summary Sheet

Summarizes the data elements required by the Environmental Protection Agency (EPA) to aid in efficient reporting by DEQ and state pretreatment programs.

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Form 1  
Cover Sheet



## Form 1 – Cover Sheet

**Control Authority Name:** City of Wilsonville

**Treatment Plant Name:** Wilsonville STP

**Facility Address:** 9725 Tauchman Street  
Wilsonville, Oregon 97070

**EPA Reference Number:** OR002276

**DEQ Permit Number:** 101888

**Expiration Date:** 07/30/2025

**DEQ File Number:** 97952

**Population Served:** 27,441

**Pretreatment Contact:** Steve Gering

**Title:** Industrial Pretreatment Coordinator

**Address:** Public Works  
29799 SW Town Center Loop East  
Wilsonville, Oregon 97070

**Telephone:** 503-570-1551

**Cell phone:** 503-209-0386

**E-mail:** [gering@ci.wilsonville.or.us](mailto:gering@ci.wilsonville.or.us)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment for knowing violations.



POTW Authorized Signatory

3/6/2024

Date

Steve Gering  
Industrial Pretreatment Coordinator  
Public Works, City of Wilsonville

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Form 2  
Program Update



## Form 2 – Program Update

1. Approval Date of Original Pretreatment Program and Date Incorporated into NPDES Permit:  
**June 5, 1996**
2. Program Materials Under Development (Date Planned for Submission): **There are no Program Materials currently under development.**
3. Program Materials Submitted for Review/Approval (Date Submitted): **There are no Program Materials currently submitted for review or approval.**
4. Program Materials Approved Since Original Pretreatment Program Approval:

Local Limits Modification Approval	November 7, 2022
Public Notice for Substantial Modification	August 11, 2022
Mercury Minimization Plan	May 10, 2022
NPDES Permit #101888 Renewed	September 1, 2020
Non-substantial Modification to Implementation Manual	January 24, 2019
Non-substantial Modification to Sewer Use Ordinance	November 5, 2018
Emergency Response Plan	September 7, 2017
Local Limit Technical Review Extension	August 24, 2015
Approved Wilsonville Code Chapter 8 Housekeeping	January 6, 2015
Approved Modified Local Limits Review	September 24, 2012
Corrected Wilsonville Code Chapter 8	April 7, 2011
Implementation Manual	April 27, 2011
Revised Chapter 8 Environment, Industrial Wastewater	October 18, 2010
Implementation Manual	March 2, 2009
Wilsonville Code Chapter 8 Environment, General Provisions	June 4, 2008
Wilsonville Code Chapter 8 Environment, Industrial Wastewater	June 4, 2008
Enforcement Response Plan	June 4, 2008
Wilsonville Industrial Pretreatment Permit Format	June 4, 2008
Streamlining rules modifications:	June 4, 2008
Modification of Pretreatment IU permit format and fact sheet	March 31, 2005
Local Limits Evaluation	June 10, 2004
Prohibition for Dry cleaning discharges to Sewer Use Ordinance	December 10, 2002
pH revision to Sewer Use Ordinance	December 10, 2002
Local Limits Evaluation-Revision	September 21, 1998
Public hearing on the Pretreatment Program	Held January 22, 1996
Sewer Use Ordinance	May 20, 1996
Enforcement Response Plan	May 20, 1996
Local Limits Evaluation	May 20, 1996



## Form 2 – Program Update

5. Date the Program was Last Audited by DEQ: June 27-29, 2023
6. Local Limits Summary
- a) Date of most recent technical evaluation for local limits: June 21, 2022
- b) Date of most recent adopted technically based local limits: October 3, 2022
- c) Pollutants for which local limits have been established:

Pollutant	Local Daily Max. Limit (mg/L)
<b>Inorganics</b>	
Arsenic (t)	1.84
Cadmium (t)	1.11
Chromium (t)	205
Copper (t)	10.6
Cyanide (t)	6.97
Lead (t)	0.810
Mercury (t)	0.407
Nickel (t)	10.1
Silver (t)	2.30
Zinc (t)	3.85
pH	5.5 ≤ pH ≤ 10.0 SU*

\*SU-Standard Unit

7. Additional Noteworthy Pretreatment Activities/Accomplishments:

- The Industrial Pretreatment Coordinator participated in the Annual ACWA Conference.
- Industrial Pretreatment Coordinator provided public outreach for City’s Fats Oil and Grease Program during the Annual City Picnic.

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Form 3  
Treatment Plant Monitoring  
Influent & Effluent Data



## FORM 3 WILSONVILLE TREATMENT PLANT MONITORING

Pollutant (t)	DATE	LAB	PLT FLOW	INF mg/l	NOTES	EFF mg/l	NOTES	Percent Removal	Concentration Class A Bio-Solids mg/kg	NOTES	Ceiling Limits Class A Bio-Solids mg/kg
<b>Arsenic</b>	1/10/2023	Edge	2.824						1.000		75
	2/7/2023	Edge	2.166	0.000600		0.000500		17%			
	2/8/2023	Edge	2.118	0.000500		0.000500		0%			
	2/9/2023	Edge	2.087	0.000500		0.000500					
	7/11/2023	Edge	1.827						1.000		
	8/8/2023	Edge	1.833	0.000890		0.000500		44%			
	8/9/2023	Edge	1.837	0.000570		0.000500		12%			
	8/10/2023	Edge	1.837	0.000550		0.000500		9%			
	9/18/2023	Edge	1.775						0.800		
	10/3/2023	Edge	1.816						0.800		
<b>Cadmium</b>	1/10/2023	Edge	2.824						1.000		85
	2/7/2023	Edge	2.166	0.000250		0.000250		0%			
	2/8/2023	Edge	2.118	0.000110	J	0.000250		-127%			
	2/9/2023	Edge	2.087	0.000250		0.000250					
	7/11/2023	Edge	1.827						1.000		
	8/8/2023	Edge	1.833	0.000220	J	0.000250		-14%			
	8/9/2023	Edge	1.837	0.000090	J	0.000250		-178%			
	8/10/2023	Edge	1.837	0.000100	J	0.000250		-150%			
	9/18/2023	Edge	1.775						0.800		
	10/3/2023	Edge	1.816						0.800		
<b>Chromium</b>	2/7/2023	Edge	2.166	0.005300		0.001300		75%			N/A
	2/8/2023	Edge	2.118	0.004100		0.001700		59%			
	2/9/2023	Edge	2.087	0.003700		0.000700	J	81%			
	8/8/2023	Edge	1.833	0.004000		0.001000		75%			
	8/9/2023	Edge	1.837	0.002700		0.001000		63%			
	8/10/2023	Edge	1.837	0.002400		0.001000		58%			
<b>Copper</b>	1/10/2023	Edge	2.824						164		4300
	2/7/2023	Edge	2.166	0.003600		0.006600		-83%			
	2/8/2023	Edge	2.118	0.028900		0.005300		82%			
	2/9/2023	Edge	2.087	0.026600		0.006900		74%			
	7/11/2023	Edge	1.827						280		
	8/8/2023	Edge	1.833	0.043200		0.008300		81%			
	8/9/2023	Edge	1.837	0.030500		0.008900		71%			
	8/10/2023	Edge	1.837	0.034700		0.009300		73%			
	9/18/2023	Edge	1.775						217		
	10/3/2023	Edge	1.816						224		
<b>Cyanide</b>	2/6/2023	Edge	2.041	0.014000		0.004000	J	71%			N/A
	2/7/2023	Edge	2.166	0.013000		0.003500	J	73%			
	2/8/2023	Edge	2.118	0.011000		0.004700	J	57%			
	8/7/2023	Edge	1.816	0.036000		0.008000		78%			
	8/8/2023	Edge	1.833	0.042000		0.005000		88%			
	8/9/2024	Edge	1.837	0.037000		0.006000		84%			

## FORM 3 WILSONVILLE TREATMENT PLANT MONITORING

Pollutant (t)	DATE	LAB	PLI Flow	INF mg/l	NOTES	EFF mg/l	NOTES	Percent Removal	Concentration Class A Bio-Solids mg/kg	NOTES	Ceiling Limits Class A Bio-Solids mg/kg
<b>Lead</b>	1/10/2023	Edge	2.824						1.000		840
	2/7/2023	Edge	2.166	0.000700		0.000400	J	43%			
	2/8/2023	Edge	2.118	0.000820		0.000270	J	67%			
	2/9/2023	Edge	2.087	0.001000		0.000500		50%			
	7/11/2023	Edge	1.827						1.000		
	8/8/2023	Edge	1.833	0.002100		0.000390	J	81%			
	8/9/2023	Edge	1.837	0.001600		0.000390	J	76%			
	8/10/2023	Edge	1.837	0.000790		0.000440	J	44%			
	9/18/2023	Edge	1.775						0.800		
	10/3/2023	Edge	1.816						0.800		
<b>Mercury</b>	1/10/2023	Edge	2.824						0.008		57
	2/7/2023	Edge	2.166	0.014300	D1	0.001610		89%			
	2/8/2023	Edge	2.118	0.013800	D1	0.001600		88%			
	2/9/2023	Edge	2.087	0.013400	D1	0.001680		87%			
	7/11/2023	Edge	1.827						0.063		
	8/8/2023	Edge	1.833	0.001630		0.001560		4%			
	8/9/2023	Edge	1.837	0.060200		0.001400		98%			
	8/10/2023	Edge	1.837	0.000986		0.000500		49%			
	9/18/2023	Edge	1.775						0.049		
	10/3/2023	Edge	1.816						0.046		
<b>Molybdenum</b>	1/10/2023	Edge	2.824						7.5		75
	2/7/2023	Edge	2.166	0.002400		0.001200		50%			
	2/8/2023	Edge	2.118	0.003000		0.001400		53%			
	2/9/2023	Edge	2.087	0.002300		0.001300		43%			
	7/11/2023	Edge	1.827						16.0		
	8/8/2023	Edge	1.833	0.004700		0.003600		23%			
	8/9/2023	Edge	1.837	0.004600		0.003700		20%			
	8/10/2023	Edge	1.837	0.005300		0.003700		30%			
	9/18/2023	Edge	1.775						10.0		
	10/3/2023	Edge	1.816						10.0		
<b>Nickel</b>	1/10/2023	Edge	2.824						20		420
	2/7/2023	Edge	2.166	0.003500		0.001300		63%			
	2/8/2023	Edge	2.118	0.003800		0.001700		55%			
	2/9/2023	Edge	2.087	0.003600		0.001100		69%			
	7/11/2023	Edge	1.827						22		
	8/8/2023	Edge	1.833	0.004500		0.001400		69%			
	8/9/2023	Edge	1.837	0.003100		0.001400		55%			
	8/10/2023	Edge	1.837	0.003200		0.001400		56%			
	9/18/2023	Edge	1.775						21		
	10/3/2023	Edge	1.816						19		

## FORM 3 WILSONVILLE TREATMENT PLANT MONITORING

Pollutant (t)	DATE	LAB	PLT FLOW	INF mg/l	NOTES	EFF mg/l	NOTES	Percent Removal	Concentration Class A Bio-Solids mg/kg	NOTES	Ceiling Limits Class A Bio-Solids mg/kg
<b>Selenium</b>	1/10/2023	Edge	2.824						1.000		100
	2/7/2023	Edge	2.166	0.001000		0.001000		0%			
	2/8/2023	Edge	2.118	0.000900	J	0.000300	J	67%			
	2/9/2023	Edge	2.087	0.000600	J	0.000300	J				
	7/11/2023	Edge	1.827						1.600		
	8/8/2023	Edge	1.833	0.000620	J	0.000320	J	48%			
	8/9/2023	Edge	1.837	0.000560	J	0.001000		-79%			
	8/10/2023	Edge	1.837	0.000510	J	0.001000		-96%			
	9/18/2023	Edge	1.775						0.800		
	10/3/2023	Edge	1.816						1.600		
<b>Silver</b>	2/7/2023	Edge	2.166	0.000200		0.000200		0%			N/A
	2/8/2023	Edge	2.118	0.000190	J	0.000200		-5%			
	2/9/2023	Edge	2.087	0.000200		0.000200		0%			
	8/8/2023	Edge	1.833	0.000570		0.000200		65%			
	8/9/2023	Edge	1.837	0.000320	J	0.000200		38%			
	8/10/2023	Edge	1.837	0.000300		0.000200		33%			
<b>Zinc</b>	1/10/2023	Edge	2.824						208		7500
	2/7/2023	Edge	2.166	0.099900		0.071500		28%			
	2/8/2023	Edge	2.118	0.107000		0.076000		29%			
	2/9/2023	Edge	2.087	0.096700		0.090700		6%			
	7/11/2023	Edge	1.827						313		
	8/8/2023	Edge	1.833	0.195000		0.093100		52%			
	8/9/2023	Edge	1.837	0.125000		0.107000		14%			
	8/10/2023	Edge	1.837	0.124000		0.115000		7%			
	9/18/2023	Edge	1.775						290		
	10/3/2023	Edge	1.816						318		
Practical Quantitation Limit (PQL) used in lieu of non-detect laboratory results.											

All data gathered and analyzed using approved test methods (40 CFR Part 136 for wastewater and 40 CFR Part 503 for biosolids).

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Form 4  
Headworks Loading Comparison



## Form 4 – Headworks Loading Comparison

**INSTRUCTIONS:** Provide a comparison of the POTW’s “allowable headwork’s loading (lb/day)” to the highest recorded actual loading for each local limit pollutant. Provide table/narrative discussion of the status of the POTW’s local limits. (See Annual Report Guidance)

**ADDITIONAL EXPLANATION:** This form represents a comparison between the Maximum Allowable Headworks Loading (or MAHL) calculated during local limits development from a combination of estimates and actual plant data from July and August, 2021 highest actual loading received for the constituents listed below.

The “ACTUAL MAX” values represent the highest single day treatment plant influent load for each pollutant of concern during the calendar year.

Pretreatment staff reviewed the plant operations logs for episodes of plant operational problems, plant upsets, pass-through, or interference and found that the City had minor operational issues but these issues were not associated with industrial discharges.

Wilsonville Wastewater Treatment Plant				
Pollutants with Quantitative Local Limits	MAHL (lbs/day)	Headworks Loading (lbs/day)	Percent of MAHL (%)	Date of Highest Loading
Arsenic	4.78	0.000890	28.46%	8/8/2023
Cadmium	2.89	0.000220	0.12%	8/8/2023
Chromium	532	0.005300	0.02%	2/7/2023
Copper	28.4	0.043200	2.33%	8/8/2023
Cyanide	18.2	0.004200	0.35%	8/8/2023
Lead	2.13	0.002100	1.51%	8/8/2023
Mercury	1.06	0.060200	87.01%	8/9/2023
Nickel	26.4	0.004500	0.26%	8/8/2023
Silver	5.96	0.000570	0.00%	8/8/2023
Zinc	13.4	0.195000	22.25%	8/8/2023

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Form 5  
Treatment Plant Upsets





## Form 5 – Treatment Plant Upsets/Problems

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

Upset/Problem	Yes	No	Unknown	Explain:
Interference		<b>X</b>		
Pass through		<b>X</b>		
Fire or explosions (including flash point violations)	<b>X</b>			Small fire started in biosolids contained in bio trailer. Set off sprinklers that put out fire.
Corrosive structural damage (including pH < 5.0)		<b>X</b>		
Flow obstruction(s)		<b>X</b>		
Excessive flow or pollutant concentrations		<b>X</b>		
Heat problems		<b>X</b>		
Interference due to oil and grease		<b>X</b>		
Toxic fumes		<b>X</b>		
Illicit dumping of hauled waste		<b>X</b>		

2. Provide a description of each instance of treatment plant upset (pass through or interference) due in whole or in part to a non-domestic discharge: N/A

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Form 6  
Regulated Users



## Form 6 – List of Regulated Industrial Users

Name of User	SIU	CIU	40 CFR Part	NDCIU (Y/N)	NSCIU (Y/N)	Middle Tier	SIC Code	Permit
Swire Pacific Holdings	Yes	No	403.3	No	N/A	N/A	2086	10-001C
ODOC CCCF	Yes	No	403.3	No	N/A	N/A	9223	11-009B
Fujimi America	Yes	No	403.3	No	N/A	N/A	3291	10-004B
Flir Systems Inc.	Yes	Yes	433.17 (A)	No	N/A	N/A	3827	11-010B
TE Connectivity	Yes	Yes	433.17 (A)	No	N/A	N/A	3496	2328-0202
Xerox	Yes	Yes	433.17 (A)	No	N/A	N/A	3471	2126-0205
Photo Solutions	Yes	Yes	433.17 (A)	No	N/A	N/A	3827	11-011C
Leader Technologies	No	Yes	433.17 (A)	Yes	N/A	N/A	3471	2328-0307
Curran Coil Springs	No	Yes	433.17 (A)	Yes	N/A	N/A	3471	2328-0306

CIU Categorical Industrial User

IU Industrial User

N/A Not Applicable

NDCIU Non-discharging Categorical

NOV Notice of Violation

SIC Standard Industrial

SIU Significant Industrial

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Form 6A  
Industrial Survey Update



## Form 6A – Industrial Survey Update

Name of User	Survey Returned (Y/N)	Permit Application Required (Y/N)	Permit Application Returned (Y/N)	Permit Issued (Y/N)	Comments
Oregon NVC Laboratory	Y	Y	Y	Y	BMP Agreement
Jubitz Gas Station	Y	Y	Y	Y	BMP Agreement
Shell Gas Station	Y	Y	Y	Y	BMP Agreement

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Form 7  
SIU Compliance & Oversight Summary



**Form 7 – Compliance/Oversight Summary (SIU Only)**

Name of SIU	Permit Expiration	Number of Documented Inspections	POTW Sampling	SIU Self-Monitoring (All Regulated Pollutants)	SNC
Swire Pacific Holdings, Inc.	12/15/2024	1	1	12	No
ODOC CCCF	1/15/2026	1	1	12	No
Fujimi America	1/19/2025	1	1	12	No
Flir Systems Inc.	2/15/2026	1	1	12	No
TE Connectivity	3/20/2028	1	1	12	No
Xerox	3/15/2026	1	1	12	No
Photo Solutions	3/18/2026	1	1	12	No
Leader Technologies	8/13/2028	1	0	0	No
Curran Coil Springs	8/13/2028	1	0	0	No

Use the following code for SNC: A-SNC with Applicable Pretreatment Standards  
 B-SNC with Self-Monitoring  
 C-SNC with Reporting  
 D-SNC with Compliance Schedule

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Form 8  
SIU Non-Compliance & Enforcement Summary





## Form 8 – Noncompliance/Enforcement Summary

Name of User	Nature of Violation	Date of Violation	POTW Enforcement Response	Date of POTW Response	Date of Return to Compliance	Comments
ODOC CCCF	Missed sample	10/10/2023	NOV	10/10/2023	10/25/2023	Level 1 Monitoring Violation
Photo Solutions	Haz. Waste Manifests Not Readily Available During Inspection	6/28/2023	NOV	7/28/2023	08/31/2023	Level 1 Record Keeping
Photo Solutions	Spill/Slug Plan Not Readily Available During Inspection	6/28/2023	NOV	7/28/2023	08/31/2023	Level 1 Record Keeping

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Form 9  
Resource Summary



## Form 9 – Resource Summary

<b>Labor Concentration:</b>			
One full time employee (FTE) coordinates the Pretreatment Program and other non-pretreatment programs. Labor concentrations are only for the Pretreatment Program.			
Pretreatment Program			
Activity	2023	2024	Comments
Sampling	2%	10%	Compliance sampling for SIU & CIU
Facility Inspection	2%	20%	Permitted and Non-Permitted
Administration	30%	30%	Communication, Data entry
Management	10%	10%	Program Development
Enforcement	5%	5%	Permitted, BMPA and non-regulated
Total Pretreatment Hours	49%	75%	

<b>Operating Cost:</b>	2023	2024	Allocated Budget
Laboratory	N/A	N/A	Independent Lab
Sampling and Inspection	\$9,500	\$9,500	One FTE: Sampling, Inspection, Permit Writing and Enforcement. FTE also coordinates Non-Pretreatment Programs.
Permit Writing	(labor)	(labor)	
Enforcement	(labor)	(labor)	
Total Costs (\$)	\$9,500	\$9,500	

<b>Income Revenue:</b>	2023	2024	
Sewer Use	\$11,634.00	\$28,254.00	Annual sewer inspection fees
Extra Strength	\$335,482.00	\$330,000.00	High BOD (Biological Oxygen Demand), TSS and Flow
Impervious Area	N/A	N/A	
Penalties	N/A	N/A	
Total Income (\$)	\$347,116.00	\$356,254.00	

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Form 10  
Program Evaluation



## Form 10 – Program Evaluation

1. Has a change in contributing jurisdictions occurred since the last Annual Report? No  
If yes, identify the jurisdictions that have been added or removed:
2. Has the Control Authority updated its Industrial User Survey to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? No  
[(403.8(f)(2)(i)] If yes:  
a) Are any of these IUs located in new service areas (describe)? No  
b) Have any IUs located in contributing jurisdictions where the POTW has no Inter-jurisdictional agreements or IU Contracts? No
3. For any new Categorical Industrial Users or processes identified during the Report period:  
a) Baseline Monitoring Report (BMR) Submitted? Yes  
b) Final (90-day) Compliance Report (FCR) Submitted? Yes
4. How many IUs are currently permitted, or identified by the Control Authority in each of the following categories during the Report period?  
9 TOTAL SIUs  
(a) 6 Categorical Industrial Users (CIUs)  
(b) 3 Significant Non-categorical IUs  
(c) N/A NDCIUs subject to zero discharge limits  
(d) N/A “Middle Tier” categorical industrials users\*  
2 NDCIUs that are not subject zero discharge categorical limits  
N/A Non-Significant Categorical Industrial User (NSCIU)\*  
10 Other regulated non-categorical IUs (Describe):  
Best Management Practice Agreements
- \*For both NSCIUs and MTCIUs please indicate N/A if the POTW has NOT adopted these provisions. “0” if you have adopted the provisions but do not currently permit any IUs as such)
5. Is the Control Authority’s definition of “Significant Industrial User” the same as EPA’s?[403.3(v)(1)(i-ii)] Yes  
If not, the Control Authority has defined “Significant Industrial User” to mean:
6. How many SIUs are required to be covered by an individual control mechanism? 9  
How many SIUs are not covered by an existing, unexpired permit or other control mechanism? 0  
Explain:

7. Were individual control mechanisms issued/reissued for 90% of the SIUs within 180 days of the expiration date? Yes  
 How many control mechanisms were not issued within 180 days of the expiration date? 0  
 Explain:
8. How many NDCIUs have been issued a control mechanism? 2/100%  
 a) How many NDCIUs subject to a zero-discharge prohibition have been issued a control mechanism? (Number/percent) N/A  
 b) How many NDCIUs NOT subject to a zero discharge and have been issued a control mechanism? 2 / 0%  
 c) Does the POTW require annual certification of NDCIUs in lieu of issuing a control mechanism? Yes  
 Comments, if any: Permits are issued NDCIU. Permits require submittal of semi-annual Certification.
9. Does the POTW accept hauled domestic waste? No
10. Does the POTW accept hauled non-hazardous industrial waste? No
11. Does the Control Authority have a control mechanism for regulating IUs whose waste are trucked to the treatment plant? N/A  
 If yes, does control mechanism designate a discharge point?  
 (Describe): Wilsonville Sewer Use Ordinance (SUO) prohibits the discharge of trucked/hauled waste
12. Are all applicable categorical standards and local limits applied to IUs whose wastes are trucked into the POTW? N/A  
 If not, why:
13. Has the Control Authority evaluated the need for SIUs to develop slug discharge control plans? [403.8(f)(2)(vi)] Yes  
 If yes, when was the evaluation last conducted and what criteria were used to identify the IUs for slug plans? Evaluations are ongoing. Pretreatment Audit June 27-29, 2023 performed on identified two slug plans in need of update, Xerox and Photo Solutions.

		<b>During Report Period</b>	<b>Total</b>
How many slug control plans:	Required?	2	2
	Received?	2	2
	Approved?	2	2

14. Are TTO (Total Toxic Organics) standards or alternatives (solvent management plans or oil & grease monitoring) being implemented for IUs subject to TTO limitations? Yes  
 If not, why? N/A  
 Are TTO standards being applied to other IUs? No

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

	Influent	Effluent	Sludge	Ambient (Receiving Water)
Metals	6	6	4	0
Priority Pollutants	0	0	0	0
Biomonitoring	0	0	0	0
TCLP (Toxicity Characteristic Leaching Procedure)	0	0	0	0
EP Tox	0	0	0	0
Other:	0	0	0	0

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

Scheduled: No                      Unscheduled: Yes                      Demand: No

If yes, explain:

Unable to inspect unscheduled at State Prison due to security reasons. Xerox has processes that do not run every day.

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

a) Number and % not sampled:   0   (  0  %)

b) Number and % not inspected:   0   (  0  %)

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

a) If requested: Yes

b) To verify IU self-monitoring: Yes

19. Provide the following analytical information regarding pollutant analyses:

	Analytical Method	Name Of Laboratory
Mercury	40 CFR Part 136 (200.8)	Edge Analytical Laboratories
Other Metals	(Hg 1631-E)	Edge Analytical Laboratories
Cyanide	Standard Methods 4500-CN-E	Edge Analytical Laboratories
Other:	(608, 624, 625)	Edge Analytical Laboratories

20. Does the Control Authority use QA/QC (Quality Assurance/Quality Control) for sampling and analysis? Yes

If yes, describe:

In-house QA/QC for sampling and analysis confirmed on an annual basis by on site DEQ NPDES compliance inspection, and EPA Laboratory Study.

21. How much time normally elapses between sample collection and obtaining analytical results? 10 Days

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

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

Once per year

Prior to each sampling

Other

Only when discharge is suspected. No suspected discharge in 2023

Did the Control Authority find any problems?

No

If yes, explain:

24. Does the Control Authority compare all monitoring data to applicable pretreatment standards and requirements contained in the control mechanism within 15 days of its receipt? Yes

25. Does the Control Authority use EPA's definition of Significant Noncompliance (SNC)?[403.8(f)(2)(viii)] Yes



26. Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to submit additional monitoring within 30 days after the violation is identified? [403.12(g)(2)] Yes

27. If the Control Authority conducts monitoring in lieu of the user, does the Control Authority resample and obtain results within 30 days of identifying and violation? No

28. Date that administrative penalties were last updated: Date: 10/24/2014

29. Indicate the compliance/enforcement options that are available in the event of IU noncompliance:

Yes, Notice of Violation or Letter of Violation

Yes, Compliance Schedule

Yes, Injunctive Relief

Yes, Imprisonment

Yes, Termination of Service

Yes, Administrative Order

Yes, Revocation of Permit

Yes, Fines (Maximum Amount)

a) Civil \$5,000/day/violation

b) Criminal \$5,000/day/violation

c) Administrative \$5,000/day/violation

30. For each of the listed enforcement actions, identify the following for the ones the Control Authority has used during the reporting period:

	Total # of Actions	# of Industries Affected
Written notice or letter of violation	3	2
Administrative orders	0	0
Administrative fines	0	0
Show cause hearings	0	0
Compliance orders	0	0
Permit revocation	0	0
Civil action	0	0
Criminal action	0	0
Termination of service	0	0
Other (specify):	0	0

31. For each of the listed enforcement actions, identify the following for the ones the Control Authority has used during the reporting period:

	Number	Amount (\$)
Civil	0	0
Administrative	0	0
Total	0	0

32. Indicate the number and percent of SIUs that were identified as being in SNC (as defined by EPA) with the following during the reporting period:

	# of SNC SIUs	% of SNC SIUs
Applicable pretreatment standards	0	0
Self-monitoring requirements	0	0
Reporting requirements	0	0
Pretreatment compliance schedule	0	0
Other:	0	0

33. Did the Control Authority publish all SIUs in SNC in newspapers, or general arbitration that provides meaningful public notice within the instructions served by the POTW? [403.8(f)(2)(vii)] If yes, attach copy, or attach copy of affidavit of publication. **No SNCs for 2022** N/A

34. Indicate the number of SIUs that are currently in SNC with self-monitoring and were not inspected or sampled: 0

35. How many SIUs are currently on compliance schedules in order to meet new or revised national pretreatment standards or requirements? 0
36. Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance? [403.6(b)] No
37. Have any IUs requested that data be held confidential? No
38. Have any requests been made by the public to review files? No
39. Are all records maintained for at least 3 years? Yes
40. Are there significant public or community issues impacting the POTW's pretreatment program? No  
 If yes, explain:  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
41. Have any problems in program implementation been observed which appear to be related to inadequate funding, resources or staff? No
42. Does the Control Authority have adequate resources to implement the pretreatment program? Yes
43. Does the Control Authority have the technical documents necessary for implementing its pretreatment program? Yes
44. Does the Control Authority have access to adequate: Yes

	Yes	No	Explain:
Sampling Equipment	Yes		4 samplers, sampling bottles
Safety Equipment	Yes		Budget for safety equipment
Vehicles	Yes		One Ford Ranger
Analytical equipment	Yes		Field pH meter, sulfide test kits

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Form 11  
Sewage Treatment Plant Profile



## Form 11 – Sewage Pretreatment Plant Profile

Complete this section for each sewage treatment plant operated under an NPDES/WPCF Permit.

DEQ NPDES/WPCF Permit Number: 101888 EPA REF# OR-002276-4

1. Treatment Plant Design Dry Weather Flow (MGD) 4.0 MGD (Million Gallons per Day)
2. Treatment Plant Actual Dry Weather Flow (Ave.) (MGD) 1.865 MGD
3. Treatment Plant Design Wet Weather Flow (MGD) 4.72 MGD
4. Treatment Plant Actual Peak Wet Weather Flow (MGD) 4.719 MGD
5. Sewerage System:
  - a) Separate (%) 100%
  - b) Combined (%) 0%
  - c) Number of CSOs 0
6. Industrial Contribution
  - a) Flow (MGD) 0.15 MGD
  - b) % of Influent 7.2%
  - c) Number of contributing SIUs (non-CIUs) 3
  - d) Number of contributing CIUs 4
7. Level of Treatment and Description
  - a) Preliminary Screening
  - b) Primary No
  - c) Secondary Yes
  - d) Tertiary Stainless steel screens
  - e) Type of Disinfection UV Lights
8. Receiving Water
  - a) Name: Willamette River
  - b) Classification (NPDES/WPCF Permit Hydro Code): 22-Will 38.5D
  - c) Designated Beneficial Uses N/A  
(OAR 340-41 Basin Standards)
9. Effluent Discharged to Any Location Other than Receiving Water? No  
If yes, Indicate Where, When, and Describe: N/A
10. Indicated methods of biosolids (sludge) disposal (Mg/Kg (dry weight) / year)
  - a) Land Application 382.60 Dry tons of Class A
  - b) Municipal Solid Waste Landfill 0
  - c) Sale or Donation to Public None
  - d) Other (Specify) N/A

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Form 12  
Pretreatment Program Profile



## FORM 12 – Pretreatment Program Profiles

1. Information pertaining to contributing jurisdictions (Complete for each jurisdiction)

a) Name of contributing jurisdiction: None

DEQ approved IJA or IGS

Date approved by DEQ:

Date incorporated into NPDES/WPCF permit:

Number of CIUs in contributing jurisdiction Number  
of other SIUs in contributing jurisdiction

b) Name of contributing jurisdiction: None

DEQ approved IJA or IGS

Date approved by DEQ:

Date incorporated into NPDES/WPCF permit:

Number of CIUs in contributing jurisdiction Number  
of other SIUs in contributing jurisdiction

c) If relying on contributing jurisdictions, indicate, for each, which activities they are required to perform:

Name: N/A

Industrial Waste Survey (IWS)

Permit Issuance

Inspection Sampling Enforcement

Notification of Industrial Users (IUs) of Pretreatment Requirements

Receipt and Review of IU Reports

Analysis of Samples Other (Specify)

Name: N/A

Industrial Waste Survey (IWS)

Permit Issuance

Inspection Sampling Enforcement

Notification of Industrial Users (IUs) of Pretreatment Requirements

Receipt and Review of IU Reports

Analysis of Samples Other (Specify)

Name: N/A

Industrial Waste Survey (IWS)

Permit Issuance

Inspection Sampling Enforcement

Notification of Industrial Users (IUs) of Pretreatment Requirements

Receipt and Review of IU Reports

Analysis of Samples Other (Specify)

2. Indicate approved pretreatment program compliance and inspection frequency requirements:

a) Inspections

- 1. CIUs 1 Annually
- 2. Other SIUs 1 Annually

b) Sampling by Control Authority (i.e., the municipality or POTW)

- 1. CIUs 1 Annually
- 2. Other SIUs 1 Annually

c) Industrial user (IU) self-monitoring

- 1. CIUs Monthly
- 2. Other SIUs Monthly

d) Reporting by IUs

- 1. Other CIUs NDCIUs required to submit annual No-Discharge Certification
- 2. Other SIUs 6 BMP agreements require monthly reporting

3. Removal Credits:

- a) Is the Control Authority currently authorized to issue removal credits? No
- b) Has the POTW applied for authorization to issue removal credits? No  
Date: N/A
- c) Has the Control Authority issued any removal credits? No  
Date: N/A
- d) Date of most recent removal credits approval (if applicable): Date: N/A

4. Is any part of the pretreatment program being operated under any pretreatment- related consent decree, administrative order, compliance schedule, or other enforcement action? N/A

If yes, explain:

5. List NPDES/WPCF Permit effluent and biosolids limits violated and suspected causes:

Daily Maximum TSS pounds for June 28 2023: The Permit excursions were the result of a failed row of filters in our disk filter assembly caused by a blown out backwash nozzle. The issue was found after a high turbidity reading and torn filters were immediately replaced.

E. coli single sample exceedance 11/14/2023: Buildup of algae past UV system at sample point. Discovered that UV area was only area being cleaned and missing the cleaning of the outfall area.

6. Have treatment plant biosolids violated any TCLP tests? No  
If Yes, Explain: N/A



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Form 13  
Pretreatment Data Summary



## Form 13 – Pretreatment Data Summary Sheet

Reference	Question Narrative	Response
<u>Form 2, Question 6</u>	Date of Most Recent Technical Evaluation for Local Limits	6/21/2022
	Date of Most Recent Adoption of Technically Based Local Limits	10/3/2022
	Pollutants for which local limits have been established	As, Cd, Cr, Cu, Cyanide, Pb, Hg, Ni, Ag, Zn, pH
<u>Form 10, Question 4</u>	Has City adopted NSCIU/MTCIU?	Yes
	Number of SIUs	9
	Number of CIUs	6
	Number of Non Categorical SIUs	3
	Number of NDCIU subject to zero discharge	0
	Number of NDCIU NOT subject to zero discharge	2
	Number of NSCIU	0
	Number of other Permitted IUs (not SIU or CIU)	10
<u>Form 10, Question 6</u>	Number of SIUs Without Control Mechanism	0
<u>Form 10, Question 9</u>	Acceptance of Hauled Domestic Wastes?	No
<u>Form 10, Question 10</u>	Acceptance of Non-Hazardous Industrial Wastes?	No
<u>Form 10, Question 17</u>	Number of SIUs Not Sampled	0
	Number of SIUs Not Inspected	0
<u>Form 10, Question 30</u>	Number of Violation Notices Issued to SIUs	
	Number of Administrative Orders Issued to SIUs	0
	Number of Civil Suits Filed Against SIUs	0
	Number of Criminal Suits Filed Against SIUs	0
<u>Form 10, Question 31</u>	Number of IUs from which Penalties have been collected	0
	Dollar Amount of Penalties Collected	\$0
<u>Form 10, Question 32</u>	Number of SIUs in SNC with Pretreatment Standards	0
	Number of SIUs in SNC with Self-Monitoring Standards	0
	Number of SIUs in SNC with Reporting Requirements	0
	Number of SIUs in SNC with Pretreatment Compliance Schedule	0
<u>Form 10, Question 33</u>	Are all SIUs in SNC Published in Newspaper?	Yes
<u>Form 12, Question 3</u>	Is Control Authority currently authorized to issue removal credits?	No
	Has the POTW applied for authorization to issue removal credits?	No
	Has the Control Authority issued any removal credits?	No
	Date of Most Recent Removal Credits Approval ( <i>if applicable</i> )	N/A

For questions regarding this report, please contact:

Steve Gering  
Industrial Pretreatment Coordinator  
503-570-1551  
[gering@ci.wilsonville.or.us](mailto:gering@ci.wilsonville.or.us)



City of Wilsonville  
Public Works  
29799 SW Town Center Loop E  
Wilsonville, OR 97070