



Laying the foundation
for a **vibrant economy**
and **healthy environment**

Discovery Clean Water Alliance



Industrial Pretreatment Program

Annual Report

2025

Discovery Clean Water Alliance
Industrial Pretreatment Program
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OBJECTIVES

The objectives of the Discovery Clean Water Alliance Industrial Pretreatment Program are:

- To protect the Publicly Owned Treatment Works (POTW) from potential harm by establishing clear standards and requirements for pretreatment of non-domestic waste. Harm to be prevented includes causing interference or otherwise harming the POTW, causing pass-through or otherwise harming the receiving environment, or causing the POTW to respond to a Discharge based on a real or perceived threat.
- To protect POTW staff who may be affected by wastewater and sludge in the course of their employment and to protect the general public.
- To promote the reuse and recycling of Industrial Wastewater by Industrial Users.
- To provide high-quality end products, such as reclaimed water and biosolids from the POTW, for beneficial use.
- To provide for fees for the equitable distribution of the cost of operation, maintenance, and improvement of the POTW as economically feasible.
- To enable the Alliance to comply with its National Pollutant Discharge Elimination System permit conditions, sludge use and disposal requirements, and any other Federal or State laws to which the POTW is subject.

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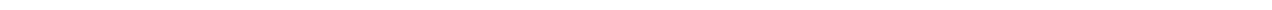


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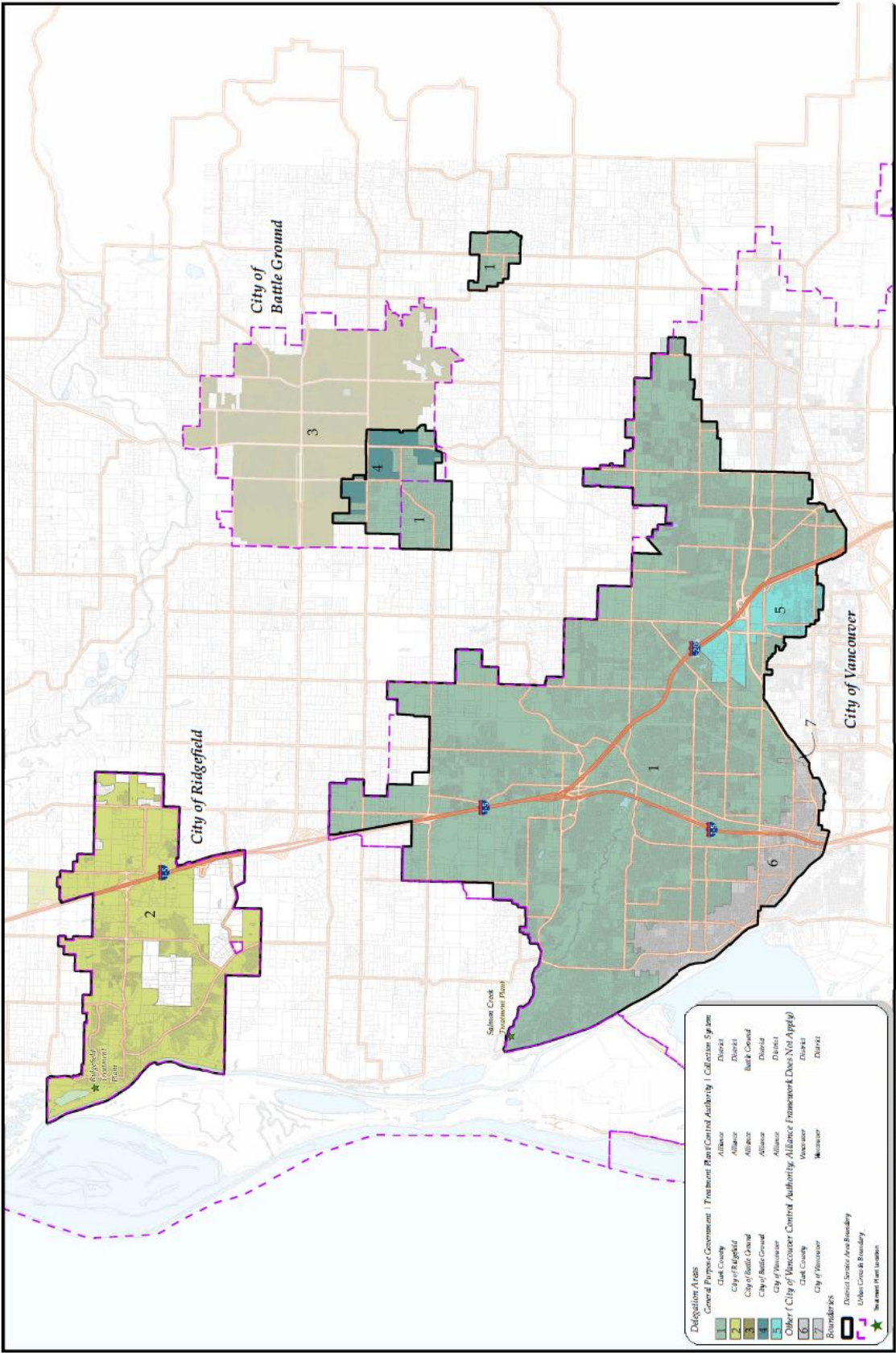
PROGRAM SUMMARY

INTRODUCTION

On January 1, 2023, the Discovery Clean Water Alliance (Alliance) was delegated authority by the Washington State Department of Ecology (Ecology) to implement an Industrial Pretreatment Program (IPP). The Alliance is an interlocal partnership that provides regional wastewater transmission and treatment services for its Members: Clark Regional Wastewater District (District), Clark County, the City of Ridgefield, and the City of Battle Ground. The Alliance contracts with the District to perform administrative services, including oversight of the IPP, as well as operations of the two Alliance wastewater treatment plants and other regional assets. The District administers the IPP throughout the Alliance service area in accordance with the Alliance Pretreatment Regulations and the Interlocal Agreement among the Alliance, the District, and the City of Battle Ground. The District also has an Interlocal Agreement with the City of Vancouver to address the area of the District that flows to the City-owned Westside Treatment Plant, which is not part of the Alliance IPP. Figure 1 shows a map of the pretreatment jurisdictional boundaries for the Alliance service area.

This Annual Report, prepared by the District on behalf of the Alliance, summarizes pretreatment program activities during the 2025 calendar year. It is submitted in accordance with Section 4.A.5 of Agreed Order 21502 (Salmon Creek Treatment Plant), Section 4.A.5 of Agreed Order 21503 (Ridgefield Treatment Plant), and Section S6.D of the National Pollutant Discharge Elimination System (NPDES) Waste Discharge Permit No. WA0023639 for the Salmon Creek Treatment Plant.

Figure 1 – Discovery Clean Water Alliance Pretreatment Jurisdiction Map



PLANT PERFORMANCE

There were no permit violations for either Salmon Creek Treatment Plant (SCTP) or Ridgefield Treatment Plant (RTP) due to interference or inhibition from industrial sources. Priority pollutant and Whole Effluent Toxicity (WET) analyses did not detect any pollutants passing through the treatment plants at levels that would cause harm to aquatic life in the receiving waters.

PROGRAM OVERVIEW

The Alliance IPP classifies industrial users (IUs) based on the quantity and nature of their wastewater discharge and issues control documents to authorize their discharge in accordance with the Alliance Pretreatment Regulations. The classes of IUs, type and current number of control documents are summarized in Table 1 below.

Table 1 – IU Classification Summary

Class	Criteria	Control Document	No.
SIU	An IU that meets one of the following: - Is subject to the Categorical Pretreatment Standards (40 CFR 405-471); - Discharges an average of 25,000 gpd or more processed wastewater to the POTW (excluding sanitary, non-contact cooling, and boiler blowdown wastewater); - Contributes 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW or - Is designated as such by the Alliance due to reasonable potential for adversely affecting the POTW's operations	Industrial Wastewater Discharge Permit (Permit)	3
MIU	An IU that does not meet the SIU criteria but is identified as having the potential to discharge wastewater that could have an adverse impact on the POTW's operations.	Letter of Discharge (LOD)	4
FOG	An IU that has the potential to introduce wastewater containing fats, oils and grease (FOG) in quantities or concentrations that could cause interference with the POTW's operations.	N/A	437

The three (3) Significant Industrial Users (SIUs) are located in the District collections system service area and flow to SCTP. SIUs are managed through annual facility inspections and sampling, reviewing self-monitoring reports, and enforcement actions as required by the

Pretreatment Regulations and Enforcement Response Plan (ERP). IPP staff prioritize maintaining working relationships and ongoing communication with these users to promote information-sharing and compliance.

The four (4) Minor Industrial Users (MIUs) are managed through periodic facility inspections and sampling and reviewing self-monitoring reports, as required. IPP staff work with users to understand pretreatment requirements and conduct enforcement actions, when necessary, per the ERP.

The majority of IUs in the Alliance IPP are classified as Fats, Oils and Grease (FOG) Users. Most are food service establishments (FSEs) and other entities that provide commercial food service, or automotive facilities. FOG Users are required to install and maintain grease removal devices (GRDs), which are managed by IPP staff through routine facility inspections and pump-out report reviews.

SUMMARY OF APPENDICES IN REPORT

Appendix A provides a summary of influent, effluent, and biosolids monitoring data for the SCTP, conducted in accordance with NPDES permit, biosolids management, and land application requirements. Metal concentrations remain below inhibition levels, and removal rates were consistent with previous years. Other pollutants monitored were either not detected or present at low levels. Biosolids production and land application data are also provided in this appendix.

Appendix B shows a comparison of the current local limits to the Maximum Allowable Headworks Loadings (MAHLs). Influent concentrations and loadings for local limit-regulated pollutants indicate that current limits are protective of water quality, beneficial biosolids reuse, and plant performance. The Alliance also performed a local limits evaluation in 2025 as required by the SCTP NPDES permit; this report has been submitted to Ecology for review.

Appendices C through I summarize program implementation activities, including an updated Industrial User summary, permit issuance and renewal activity, user inspections and monitoring information, program changes and resources. In accordance with the SCTP NPDES Permit requirements, Appendix C also includes an inventory of all known or suspected industrial users subject to Categorical Pretreatment Standards that are known or suspected to discharge PFAS.

Appendix J summarizes industrial user compliance and enforcement activities.

PRIORITIES AND ACCOMPLISHMENTS FOR REPORTING YEAR

Public Education and Outreach

The Alliance and the District continue to prioritize pollution prevention education and outreach to encourage proper disposal of non-flushable products and enhance awareness of water quality issues. These efforts included newsletter distribution, the Freeze the Grease program, and online outreach. District staff also participate in several community events throughout the year to interact directly with customers in providing this information.

Interagency Coordination and Training

IPP staff actively participate in several local, regional, and national groups to facilitate networking and knowledge-sharing in the pretreatment field. This includes membership in the Oregon Association of Clean Water Agencies (ACWA), the National Association of Clean Water Agencies (NACWA), and the Portland Metro area's Preferred Pumper Program (PPP). The District also participates in the Local Interagency Networking Cooperative (LINC) and the American Public Works Association (APWA) PreFOG subcommittee and helps to coordinate the Pacific Northwest Pretreatment Workshop sponsored by Western States Alliance (WSA). IPP staff attend formal training and webinars throughout the year as available.

Program Coordination & Optimization

The District and the City of Battle Ground continue to coordinate closely on plan review and user survey processes to ensure the program is administered effectively throughout the Alliance service area. The Alliance has also implemented a new software program to optimize resources and data management. The program is currently being used to manage FOG inspections and data, and the pretreatment module of the software will be implemented beginning in 2026.

Wastewater Surveillance Program Participation

The Alliance continued its participation in the CDC/WEF National Wastewater Surveillance System (NWSS) through partnership with the Washington Department of Health. Through this program, the Alliance provides wastewater samples for analysis of the SARS-CoV-2 virus and other respiratory illnesses to support public health initiatives.

APPENDIX A: SCTP Monitoring Data

Total Metals per EPA 200 series / HG per EPA 1631E

Parameter	Influent				Average Influent	Effluent				Average Effluent	Percent Removal	Biosolids			
	Q1	Q2	Q3	Q4		Q1	Q2	Q3	Q4			Q1	Q2	Q3	Q4
	2/20/2025	4/23/2025	9/24/2025	11/13/2025		2/20/2025	4/23/2025	9/24/2025	11/13/2025			3/20/2025	5/22/2025	8/27/2025	12/9/2025
Quarterly - PP Metals															
Antimony	0.45	0.65	0.547	0.539	0.55	0.241	0.423	0.368	0.304	0.334	39.3	2.34	2.34	2.37	1.8
Arsenic	1.75	1.83	2.27	2.03	1.97	1.36	1.28	1.52	1.47	1.41	28.4	5.8	5.3	6	4.5
Beryllium	<0.02	<0.02	0.013	<0.02	0.012	<0.02	<0.02	0.013	<0.020	0.012	0	<0.21	<0.23	0.17	<0.24
Cadmium	0.08	0.101	0.109	0.109	0.08	<0.02	<0.02	0.013	<0.020	0.012	85	0.98	0.92	1.15	0.85
Chromium	1.16	1.9	2.35	1.42	1.71	0.5	0.85	0.58	0.63	0.64	79.6	18.3	19.2	21.3	23.3
Copper	78.8	42.2	34	45.1	50	25.6	10.5	4.88	15.2	14	72	265	264	315	249
Lead	0.673	0.967	0.695	0.72	0.764	0.124	0.146	0.117	0.133	0.13	83	6.32	6.25	7.72	5.92
Mercury	<0.20	9.7	10.6	28.8**	12.3	<0.20	1.3	1.4	1.5**	1.08	91	0.28	0.65	0.5	0.45
Molybdenum	1.8	2.49	3.43	2.5	2.6	0.81	0.94	6.27	2.38	2.6	0	19.3	22.7	73.4	25.1
Nickel	1.69	2.17	2.11	2.21	2.05	0.9	1.07	1.13	1.56	1.44	29.8	15.8	16.3	17.8	15.8
Selenium	<1.0	<1.0	0.5	<1.0	0.5	<1.0	<1.0	0.5	<1.0	0.5	0	8.7	8.1	8	7.5
Silver	0.175	0.128	0.146	0.137	0.147	<0.02	<0.02	0.13	<0.020	0.04	72.8	2	2.19	2.21	1.72
Thallium	<0.02	<0.02	0.013	<0.020	0.011	<0.02	<0.02	0.013	<0.020	0.011	0	<0.21	<0.23	0.17	<0.47
Zinc	104	154	137	131	131.5	35.1	84.3	33.5	41.1	48.5	63.1	928	914	1120	870
Quarterly - Other															
pH	7.29	7.41	7.34	7.33	N/A	NT	NT	NT	NT			7.92	8.42	7.56	8.51
Oil and Grease	24.1	23.4	31.7	20.8	25	<4.9	<4.8	2.5	<5.0	2.5	90	NT	NT	NT	NT
Cyanide	<0.005	<0.005	<0.02	<0.005	NA	<0.005	<0.005	<0.02	<0.005	NA	NA	1.8	<1.4	1.4	1.7
Total Phenols	0.079	0.106	0.124	0.105	0.34	0.021	0.038	0.035	0.02	0.03	91.2	<3.0	3.1	1.86	<2.2
Chromium (hex)	0.587*	0.88	0.99	0.99	0.86	0.685	0.635	0.94	0.81	0.77	10.5	18.3	<7.51	1.83	<13.7
Annual - NPDES Table 6															
Dissolved Oxygen	NT	NT	NT	NT		7.17	NT	NT	NT	N/A		NT	NT	NT	NT
Total Kjeldahl Nitrogen (TKN)	NT	NT	NT	NT		NT	5.96	NT	NT	N/A		77800	74600	74800	77500
Nitrate-Nitrite	NT	NT	NT	NT		NT	14.8	NT	NT	N/A		NT	NT	NT	NT
Total Phosphorus	NT	NT	NT	NT		NT	2.17	NT	NT	N/A		27900	27300	35200	37200
Total Dissolved Solids (TDS)	NT	NT	NT	NT		NT	366	NT	NT	N/A		NT	NT	NT	NT
Hardness	NT	51.4	NT	NT	51.4	NT	48.1	NT	NT	48.1		NT	NT	NT	NT

Notes:

All results are reported in ug/L (influent and effluent) or mg/kg (biosolids) unless otherwise noted.

If result was reported as ND, one-half of the reporting limit was used in calculations

NT = Not Tested

* Sample date 3/6/2025; required resampling due to lab error

** Sample date 12/18/2025; required resampling due to lab error

Salmon Creek Treatment Plant (WA0023639)						
Priority Pollutant Monitoring						
PARAMETER	UNITS	INFLUENT	EFFLUENT	PERCENT REMOVAL	BIOSOLIDS (MG/KG)	
Volatil Organic Compounds (EPA 624/5035/8260C)		4/23/2025	4/23/2025		5/22/2025	12/9/2025
ACROLEIN	µg/l	<50.0	<50.0	NA	<0.043	<24
ACRYLONITRILE	µg/l	<100.0	<100.0	NA	<0.043	<24
BENZENE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
BROMOFORM	µg/l	<5.0	<5.0	NA	<0.043	<0.59
CARBON TETRACHLORIDE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
CHLOROBENZENE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
CHLORODIBROMOMETHANE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
CHLOROETHANE	µg/l	<5.0	<5.0	NA	<0.043	<0.59*
2-CHLOROETHYL VINYL ETHER	µg/l	<10.0	<10.0	NA	<0.043	<0.59
CHLOROFORM	µg/l	<5.0	<5.0	NA	<0.043	<0.59
DICHLOROBROMOMETHANE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
1,1-DICHLOROETHANE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
1,2-DICHLOROETHANE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
1,1-DICHLOROETHYLENE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
1,2-DICHLOROPROPANE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
1,3-DICHLOROPROPYLENE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
ETHYLBENZENE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
METHYL BROMIDE	µg/l	<5.00	<5.00	NA	<0.043	<0.59
METHYL CHLORIDE	µg/l	<5.00	<5.00	NA	<0.043	<0.59
METHYLENE CHLORIDE	µg/l	<5.0	<5.0	NA	<0.086	<2.4
1,1,2,2-TETRACHLOROETHANE	µg/l	<5.0	<5.0	NA	<0.043	<0.59*
TETRACHLOROETHYLENE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
TOLUENE	µg/l	<5.0	<5.0	NA	0.27	<0.59
1,2-TRANS-DICHLOROETHYLENE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
1,1,1-TRICHLOROETHANE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
1,1,2-TRICHLOROETHANE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
TRICHLOROETHYLENE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
VINYL CHLORIDE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
1,2-DICHLOROBENZENE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
1,3-DICHLOROBENZENE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
1,4-DICHLOROBENZENE	µg/l	<5.0	<5.0	NA	<0.043	<0.59
Pesticides/PCBs (EPA 608.3)						
ALDRIN	µg/l	<0.0095	<0.0094	NA	<0.013	<0.032
ALPHA-BHC	µg/l	<0.0095	<0.0094	NA	<0.0067	<0.0055
BETA-BHC	µg/l	<0.042	<0.042	NA	<0.0067	<0.0055
GAMMA-BHC	µg/l	<0.0095	<0.0094	NA	<0.0067	0.12
DELTA-BHC	µg/l	<0.0095	<0.0094	NA	<0.013	<0.0055
CHLORDANE	µg/l	<0.19	<0.19	NA	<0.0067	<0.0055
4,4-DDT	µg/l	<0.0095	<0.0094	NA	<0.013	<0.011
4,4-DDE	µg/l	<0.0095	<0.0094	NA	<0.013	<0.0055
4,4-DDD	µg/l	<0.0095	<0.0094	NA	<0.013	<0.011
DIELDRIN	µg/l	<0.0095	<0.0094	NA	<0.0067	<0.0055
ALPHA-ENDOSULFAN	µg/l	<0.0095	<0.0094	NA	<0.0067	<0.0055
BETA-ENDOSULFAN	µg/l	<0.0095	<0.0094	NA	<0.013	<0.011
ENDOSULFAN SULFATE	µg/l	<0.0095	<0.0094	NA	<0.013	<0.011
ENDRIN	µg/l	<0.0095	<0.0094	NA	<0.0067	<0.0055
ENDRIN ALDEHYDE	µg/l	<0.0095	<0.0094	NA	<0.034	<0.011
HEPTACHLOR	µg/l	<0.0095	<0.0094	NA	<0.0067	<0.0055
HEPTACHLOR EPOXIDE	µg/l	<0.0095	<0.0094	NA	<0.013	<0.011
PCB-1242	µg/l	<0.10	<0.10	NA	<0.034	<0.029
PCB-1254	µg/l	<0.10	<0.10	NA	<0.034	<0.096
PCB-1221	µg/l	<0.10	<0.10	NA	<0.034	<0.029
PCB-1232	µg/l	<0.10	<0.10	NA	<0.034	<0.12
PCB-1248	µg/l	<0.10	<0.10	NA	<0.034	<0.087
PCB-1260	µg/l	<0.10	<0.10	NA	<0.1	<0.029
PCB-1016	µg/l	<0.10*	<0.10	NA	<0.034	<0.029
TOXAPHENE	µg/l	<0.48	<0.47	NA	<0.670	<0.55

Salmon Creek Treatment Plant (WA0023639) Priority Pollutant Monitoring						
PARAMETER	UNITS	INFLUENT	EFFLUENT	PERCENT REMOVAL	BIOSOLIDS (MG/KG)	
Semivolatile Organic Compounds (EPA 625.1)		4/23/2025	4/23/2025		5/22/2025	12/9/2025
2-CHLOROPHENOL	µg/l	<20	<0.83	NA	<130	<65
2,4-DICHLOROPHENOL	µg/l	<20	<0.83	NA	<130	<65
2,4-DIMETHYLPHENOL	µg/l	<20	<0.83	NA	<130	<65
4,6-DINITRO-2-METHYLPHENOL	µg/l	<50	<2.1	NA	<760	<390
2,4-DINITROPHENOL*	µg/l	<100	<4.2	NA	<760	<390*
2-NITROPHENOL*	µg/l	<20	<0.83	NA	<130	<65*
4-NITROPHENOL	µg/l	<50	<2.1	NA	<760	<390
4-CHLORO-3-METHYLPHENOL	µg/l	<20	<0.83	NA	<130	<65
PENTACHLOROPHENOL*	µg/l	<50	<2.1	NA	<760	<390*
PHENOL	µg/l	28.0	<0.83	98%	<130	<65
2,4,6-TRICHLOROPHENOL*	µg/l	<20	<0.83	NA	<130	<65*
ACENAPHTHENE	µg/l	<20	<0.83	NA	<130	<65
ACENAPHTHYLENE	µg/l	<20	<0.83	NA	<130	<66
ANTHRACENE	µg/l	<20	<0.83	NA	<130	<65
BENZIDINE*	µg/l	<50*	<2.1*	NA	<760	<65
BENZO(A)ANTHRACENE	µg/l	<20	<0.83	NA	<130	<65
BENZO(A)PYRENE	µg/l	<20	<0.83	NA	<130	<65
BENZO(B)FLUORANTHENE	µg/l	<20	<0.83	NA	<130	<65
BENZO(J)FLUORANTHENE**	µg/l	<20	<0.83	NA	<130	<65
BENZO(K)FLUORANTHENE	µg/l	<20	<0.83	NA	<130	<65
BENZO(GHI)PERYLENE	µg/l	<20	<0.83	NA	<130	<65
BIS (2-CHLOROETHOXY) METHANE	µg/l	<20	<0.83	NA	<130	<65
BIS (2-CHLOROETHYL)-ETHER	µg/l	<20	<0.83	NA	<130	<65
2,2'-OXYBIS (1-CHLOROPROPANE)	µg/l	<20	<0.83	NA	<130	<65
BIS (2-ETHYLHEXYL) PHTHALATE	µg/l	<20	<0.83	NA	<130	<65
4-BROMOPHENYL PHENYL ETHER	µg/l	<20	<0.83	NA	<130	<65
BUTYL BENZYL PHTHALATE	µg/l	<20	<0.83	NA	<130	<65
2-CHLORONAPHTHALENE	µg/l	<20	<0.83	NA	<130	<65
4-CHLOROPHENYL PHENYL ETHER	µg/l	<20	<0.83	NA	<130	<65
CHRYSENE	µg/l	<20	<0.83	NA	<130	<65
DIBENZO(A,H) ANTHRACENE	µg/l	<50	<0.83	NA	<130	<65
3,3-DICHLOROBENZIDINE	µg/l	<20	<0.83	NA	<130	<65
DIETHYL PHTHALATE	µg/l	<20	<0.83	NA	<130	<65
DIMETHYL PHTHALATE	µg/l	<20	<0.83	NA	<130	<65
2,4-DINITROTOLUENE	µg/l	<20	<0.83	NA	<130	<66
2,6-DINITROTOLUENE*	µg/l	<20	<0.83	NA	<130	<66*
DI-N-OCTYL PHTHALATE*	µg/l	<20	<0.83	NA	<130	<65*
DI-N-BUTYL PHTHALATE	µg/l	<20	<0.83	NA	<130	<65
1,2-DIPHENYLHYDRAZINE	µg/l	<20	<0.83	NA	<130	<65
FLUORANTHENE*	µg/l	<20	<0.83	NA	<130	<65*
FLUORENE	µg/l	<20	<0.83	NA	<130	<65
BENZO(R,S,T) PENTAPHENE	µg/l	<50	<2.1	NA	NT	NT
DIBENZO(A,H) ACRIDINE	µg/l	<50	<2.1	NA	NT	NT
DIBENZO(A,J) ACRIDINE	µg/l	<50	<2.1	NA	NT	NT
DIBENZO(A,E) PYRENE	µg/l	<50	<2.1	NA	NT	NT
DIBENZO(A,H) PYRENE	µg/l	<50	<2.1	NA	NT	NT
3-METHYL CHOLANTHRENE	µg/l	<50	<2.1	NA	NT	NT
PERYLENE	µg/l	<20	<0.83	NA	NT	NT

Qualifiers:

* The result is an outlier. See case narrative

** Benzo(b)fluoranthene cannot be separated from Benzo(j)fluoranthene.

Notes:

Additional priority pollutant monitoring for biosolids conducted in 2025 to investigate anomalous results in 5/22 sample, that may have been caused by construction and other maintenance activities as part of the Phase 5 Expansion project.

NT = not tested

Salmon Creek Treatment Plant (WA0023639)						
Priority Pollutant Monitoring						
PARAMETER	UNITS	INFLUENT	EFFLUENT	PERCENT REMOVAL	BIOSOLIDS (MG/KG)	
Dioxins		4/23/2025	4/23/2025		5/22/2025	12/9/2025
2,3,7,8 - TCDD	µg/l	<4.78	<4.78		<0.00000374	<3.18
Total TCDD	µg/l				<0.00000374	<3.18
2,3,7,8- Tetrachlorodibenzofuran (TCDF)	µg/l				<0.00000374	<3.18
Total-TCDF	µg/l				<0.00000374	<3.18
1,2,3,7,8- Pentachlorodibenzo-p-dioxin (PeCDD)	µg/l				<0.0000187	1.91 (JK)
Total-PeCDD	µg/l				<0.0000187	1.39 (J)
1,2,3,7,8- Pentachlorodibenzofuran (PeCDF)	µg/l				<0.0000187	<15.9
2,3,4,7,8-PeCDF	µg/l				<0.0000187	<15.9
Total-PeCDF	µg/l				<0.00000115	<0.464
1,2,3,4,7,8- Hexachlorodibenzo-p-dioxin (HxCDD)	µg/l				<0.0000187	0.725 (JK)
1,2,3,6,7,8-HxCDD	µg/l				<0.0000187	0.829 (JK)
1,2,3,7,8,9-HxCDD	µg/l				<0.0000187	<15.9
Total-HxCDD	µg/l				<0.0000187	<15.9
1,2,3,4,7,8- Hexachlorodibenzofuran (HxCDF)	µg/l				<0.0000187	0.792 (JK)
1,2,3,6,7,8-HxCDF	µg/l				<0.0000187	<15.9
1,2,3,7,8,9-HxCDF	µg/l				<0.0000187	<15.9
2,3,4,6,7,8-HxCDF	µg/l				<0.0000187	<15.9
Total-HxCDF	µg/l				<0.0000187	1.85 (J)
1,2,3,4,6,7,8- Heptachlorodibenzo-p-dioxin (HpCDD)	µg/l				<0.0000425	12.0 (BJK)
Total-HpCDD	µg/l				<0.0000825	<15.9
1,2,3,4,6,7,8- Heptachlorodibenzofuran (HpCDF)	µg/l				<0.0000187	4.85 (BJK)
1,2,3,4,7,8,9-HpCDF	µg/l				<0.0000187	<15.9
Total-HpCDF	µg/l				<0.0000187	7.5 (J)
Octachlorodibenzo-p-dioxin (OCDD)	µg/l				<0.000425	68.2
Octachlorodibenzofuran (OCDF)	µg/l				<0.0000374	35.5 (B)

Salmon Creek Treatment Plant (WA0023639)						
Priority Pollutant Monitoring						
PARAMETER	UNITS	INFLUENT	EFFLUENT	PERCENT REMOVAL	BIOSOLIDS (MG/KG)	
HEXACHLOROBENZENE	µg/l	<20	<0.83	NA	<130	<65
HEXACHLOROBUTADIENE	µg/l	<20	<0.83	NA	<130	<65
HEXACHLOROCYCLOPENTADIENE	µg/l	<100	<4.2	NA	<130	<65*
HEXACHLOROETHANE	µg/l	<20	<0.83	NA	<130	<65
INDENO(1,2,3-CD) PYRENE	µg/l	<20	<0.83	NA	<130	<65
ISOPHORONE	µg/l	<20	<0.83	NA	<130	<65
NAPHTHALENE	µg/l	<20	<0.83	NA	<130	<65
NITROBENZENE	µg/l	<20	<0.83	NA	<130	<65
N-NITROSODI-N-METHYLAMINE	µg/l	<20	<0.83	NA	<760	<390
N-NITROSODI-N-PROPYLAMINE	µg/l	<20	<0.83	NA	<130	<65
N-NITROSODI-N-PHENYLAMINE	µg/l	<20	<0.83	NA	<130	<65
PHENANTHRENE	µg/l	<20	<0.83	NA	<130	<65
PYRENE	µg/l	<20*	<0.83*	NA	<130	<65
1,2,4-TRICHLOROBENZENE	µg/l	<20	<0.83	NA	<130	<2.4
Tentatively Identified Compounds (TICs)						
N/A						

Qualifiers:

B: The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.

J: Estimated Result. Result detected below lowest point of calibration curve, but above specified MDL.

K: The abundance ratio between the primary and secondary ions were outside of theoretical acceptance limits. The concentration of this analyte should be considered an estimate.

* The result is an outlier. See case narrative.

Salmon Creek Wastewater Treatment Plant

Biosolids Testing Results 2025

Total Metals Units:mg/Kg (ppm), dry wt.									
Analyte	Analysis Method	Threshold	Event 1 2/20/2025	Event 2 3/20/2025	Event 3 5/22/2025	Event 4 7/16/2025	Event 5 8/27/2025	Event 6 12/9/2025	Annual Average
Arsenic (As)	6020A	41	5.5	5.8	5.3	6.3	6.0	4.5	5.6
Cadmium (Cd)	6020A	39	1.03	0.98	0.92	1.02	1.15	0.85	0.99
Chromium (Cr)	6020A	1200	20.3	18.3	19.2	23.0	21.3	23.3	20.9
Copper (Cu)	6020A	1500	280	265	264	276	315	249	275
Lead (Pb)	6020A	300	6.02	6.32	6.25	6.37	7.72	5.92	6.43
Mercury (Hg)	7471B	17	0.78	0.28	0.65	0.69	0.50	0.45	0.56
Molybdenum (Mo)	6020A	75	22.1	19.3	22.7	36.8	73.4	25.1	33.2
Nickel (Ni)	6020A	420	18.3	15.8	16.3	16.8	17.8	15.8	16.8
Selenium (Se)	6020A	100	9.3	8.7	8.1	12.8	8.0	7.5	9.1
Zinc (Zn)	6020A	2800	918	928	914	975	1120	870	954
Silver (Ag)	6020A		2.51	2.00	2.19	2.63	2.21	1.72	2.21
Beryllium (Be)	6020A		0.25	0.21	0.23	0.23	0.26	0.24	0.24
Antimony (Sb)	6020A		2.40	2.34	2.34	2.35	2.37	1.80	2.27
Thallium (Tl)	6020A		0.25	0.21	0.23	0.23	0.26	0.47	0.28
Chromium VI (Cr 6)	SW7196A		8.19	29.80	7.51	7.22	6.20	13.70	12.10

Biosolids Nutrient Analysis Units: mg/kg dry								
Analyte	EPA Method	Event 1	Event 2	Event 3	Event 4	Event 5	Event 6	Average
Ammonia-Nitrogen	SM4500-NH3G	14,000	13,500	15,400	18,400	14,200	10,000	14250
Total Kjeldahl Nitrogen	351.4	91,800	77,800	74,600	79,000	74,800	77,500	79,250
Total Solids %	SM2540G	13.3	13.4	13.3	13.8	13.5	14.6	13.65
Total Volatile Solids (mg/kg)	SM2540G	60.2	68.8	63.0	76.6	76.3	71.9	69.5
Phosphorus	SM4500-PB+E	29,800	27,900	27,300	30,300	35,200	37,200	31,283
Nitrate-Nitrogen	353.2M/353.2M	19.0	18.0	18.0	4.9	18.0	32.0	18.3
Nitrite-Nitrogen	353.2M	19.0	18.0	18.0	35.0	18.0	32.0	23.3
pH	9045D	8.22	7.92	8.42	8.08	7.56	8.51	8.12

Volatile Solids % Reduction (38% req.)			
Jan	64.8	Jul	59.3
Feb	62.5	Aug	57.4
Mar	64.1	Sep	59.4
Apr	64.7	Oct	59.9
May	62.3	Nov	61.6
Jun	61.1	Dec	62.6
VSR Average		61.6	

2025 - ANNUAL BIOSOLIDS (SLUDGE) PRODUCTION REPORT

SCTP Processed				
	Cubic Yards	Dry Pounds	Wet Pounds	Average Cake %
January	1,335	320,051	2,295,546	13.94
February	1,273	302,357	2,189,545	13.82
March	1,287	305,870	2,213,819	13.83
April	1,331	306,396	2,289,132	13.41
May	1,348	324,620	2,319,324	14.02
June	1,356	323,200	2,333,407	13.86
July	1,391	345,887	2,392,255	14.47
August	1,459	363,212	2,510,106	14.49
September	1,203	321,907	2,070,399	15.30
October	1,342	336,296	2,307,799	14.58
November	1,318	351,894	2,038,261	15.53
December	1,461	405,749	2,513,327	15.59
Total	16,104.15	4,007,439	27,472,920	
Tons		2,003.7	13,736.5	
Metric Tons		1,817.8	12,461.7	

Dry Ton Balance	
Total Processed	2003.7
From Ridgefield	3.8
Processed (no RF)	1999.9
To Long (NSF)	588.2
To Local (M&J)	0.0
To Local (FMF)	736.4
Stored in Bays (EOY)	203.7
Total Applied	1324.6
Est. Recycled Dry Tons	475.4

Monthly Dry Tons Hauled			
	NSF	M&J	Fire MTN
January	61.05		
February	55.83		
March	65.10		
April	67.20		
May	16.87		123.83
June			171.01
July	4.86		218.01
August	4.15		193.48
September	67.73		30.11
October	78.50		
November	63.42		
December	103.48		
Total	588.2	0.0	736.4

Current Avg. TS (Annual Summary) =
Estimated Ave. Capture Rate %

14.40
73.5

Visual Levels of Biosolids Storage Bays (2025)

(estimates taken at the start of the month)

	Visual yd ³ Bay 1	Visual yd ³ Bay 2	Visual yd ³ Bay 3	Visual yd ³ Bay 4	Total est. yd ³ (94.1/10g)	Estimated WT	Dry Tons Hauled	Estimated Bay DT (at avg TS%)
2024 Carryover					329	283		55
January	263	0	0	66	329	283	61	41
February	132	0	0	592	724	622	56	90
March	132	0	132	855	1,118	962	65	139
April	132	0	658	789	1,579	1,358	67	196
May	66	132	789	855	1,842	1,584	141	228
June	66	132	526	855	1,579	1,358	171	196
July	66	0	395	921	1,382	1,188	223	171
August	0	0	0	461	461	396	198	57
September	66	0	0	0	66	57	98	8
October	66	0	0	395	461	396	79	57
November	132	0	0	526	658	566	63	81
December	132	0	43	921	1,096	943	103	136
End of Year (EOY)	132	0	592	921	1,645	1,414		204

Assumptions:

131.57 yd³ per stoop loc0.86 x yd³ = wet tons**Ridgefield Imports (lbs)**

January	
February	
March	
April	
May	
June	
July	
August	
September	
October	
November	484
December	7186
Total (Tons)	3.84

TOTAL DRY TONS PRODUCED IN 2025 = 1,473.35

APPENDIX B: Local Limits Evaluation

Parameter	Avg Inf Conc (mg/L)	Actual Loading (lbs/day)	MAHL* (lbs/day)	Safety Factor
Arsenic	0.00197	0.154	2.86	19
Cadmium	0.00008	<0.078	0.79	>10
Chromium	0.00171	<0.784	4.01	>5
Copper	0.0500	3.899	39.3	10
Lead	0.000764	0.060	3.99	67
Mercury (ug/L)	0.03735	0.0029	0.1582	54
Molybdenum	0.00260	0.203	1.07	5
Nickel	0.00205	0.160	10.66	67
Selenium	0.000500	<0.392	0.83	>2
Silver	0.000147	<0.016	4.2	>268
Zinc	0.13150	10.254	21.2	2
Cyanide	0.01000	0.780	5.2	7

2025 Average Influent Flow (MGD): 9.35

*Discovery Clean Water Alliance Local Limits Evaluation Report, December 2025

APPENDIX C: Industrial User Survey Update

Classification	IU Name	Category	SIC Code	Permit No.	Service Area	WWTP	Max Flow (GPD)
SIU/CIU	ProTech Industries, Inc.	433.17	3329	2023-03	District	SCTP	750
SIU/CIU	nLight Photonics Corp.	469	3674	2023-01	District	SCTP	10,000
SIU/CIU	IMAT, Inc.	469	3674	2023-02	District	SCTP	1,500
MIU	Waste Connections	N/A	4953	LOD 2023-02	District	SCTP	1,000
MIU	Oldcastle	N/A	3251/5231	LOD 2023-01	Battle Ground	SCTP	16,000
MIU	Andersen Dairy	N/A	5451	LOD 2023-03	Battle Ground	SCTP	2,000
MIU	ICD Coatings	N/A	325510	LOD 2025-01	Ridgefield	SCTP	300

Abbreviations Key:

SIU	Significant Industrial User
CIU	Categorical Industrial User
MIU	Minor Industrial User
SCTP	Salmon Creek Treatment Plant
RTP	Ridgefield Treatment Plant

IU Survey - Potential PFAS Dischargers

Business Name	Address	SIC/NAICS codes	Discharges to Wastewater?	Currently permitted?	If yes, Permit No.	If no, Survey Date
Organic Chemicals, Plastics & Synthetic Fibers (OCPSF) - 40 CFR Part 414						
none identified						
Metal Finishing - 40 CFR Part 433						
ProTech Industries, Inc.	14113 NE 3rd Court, Vancouver WA 98685	3329	Y	Y	2023-03	N/A
Electroplating - 40 CFR Part 413						
Electric & Electronic Components - 40 CFR Part 469						
nLight Photonics Corp.	5408 NE 88th St., Bldg E, Vancouver WA 98665	3674	Y	Y	2023-01	N/A
IMAT, Inc.	12516 NE 95th St, Suite D110, Vancouver WA 98682	3674	Y	Y	2023-02	N/A
Landfills - 40 CFR Part 445						
none identified						
Pulp, Paper & Paperboard - 40 CFR 430						
none identified						
Leather Tanning & Finishing - 40 CFR 425						
none identified						
Plastics Molding & Forming - 40 CFR 463						
none identified						
Textile Mills - 40 CFR Part 410						
none identified						
Paint Formulating - 40 CFR Part 446						
none identified						
Airports - 40 CFR Part 449¹						
none identified						
Commercial Laundries						
none identified						

IU Survey - Potential PFAS Dischargers

Electronic Products Mnfg.						
none identified						
Hazardous Waste Generators						
none identified						
Chemical Wholesalers						
Other IUs potentially discharging PFAS:						
Centralized Waste Treatment Facilities - 40 CFR 437						
none identified						
Remediation Sites						
none identified						

Notes:
The categories listed above are as identified in Section S6.G.1 of SCTP Permit, NPDES Permit No. WA0023639.

1 40 CFR 449 applies to Airport Deicing activities

APPENDIX D: Permit Activity

NEW/RENEWED INDUSTRIAL WASTEWATER DISCHARGE PERMITS	
None	
PERMIT MODIFICATIONS	
None	
LETTER OF DISCHARGE ISSUED	
LOD 2025-01	ICD Coatings
LETTER OF ZERO DISCHARGE ISSUED	
None	
LETTER OF AUTHORIZATION ISSUED	
None	
SPECIAL WASTEWATER DISCHARGE AUTHORIZATIONS ISSUED	
None	
TERMINATED INDUSTRIAL WASTEWATER DISCHARGE PERMITS	
None	
IN PROCESS MODIFICATIONS, RENEWALS, & NEW INDUSTRIAL WASTEWATER DISCHARGE PERMITS	
None	
IN PROCESS MODIFICATIONS, RENEWALS, & NEW WASTEWATER DISCHARGE AUTHORIZATIONS	
LOD 2025-XX	City of Vancouver WS 14

APPENDIX E: Industrial User Compliance Summary

Business Name: nLight Corporation
Address: 5408 NE 88th St., Bldg. E, Vancouver WA 98665

Last Inspection: 6/2/2025 Next Inspection: 2026 - Annual

Permit Information		Self-Monitoring Reports				Non-Compliance		Enforce		SNC?	
2023-01	SIU/CIU	Date Due	Received	Date Due	Received	Date Due	Received	Type	Action		
SIC/CIU:	3674 469	2/15/2025	2/4/2025	6/15/2025	6/9/2025	10/15/2025	10/9/2025				
EFF:	7/1/2023	3/15/2025	3/6/2025	7/15/2025	7/7/2025	11/15/2025	11/11/2025				
EXP:	6/30/2028	4/15/2025	4/10/2025	8/15/2025	8/4/2025	12/15/2025	12/9/2025				
WWTP:	Salmon Creek	5/15/2025	5/5/2025	9/15/2025	9/5/2025	1/15/2026	1/5/2026				

Parameter Name	Non Location	Sample Freq	Rpt Freq	Daily Max	Limits	Units	Self Jan-25	Self Feb-25	Self Mar-25	Self Apr-25	Self May-25	Self Jun-25	Self Jul-25	Self Aug-25	Self Sep-25	Self Oct-25	Self Nov-25	Self Dec-25	Alliance Oct-25
Flow, Avg Mon	OF 001	C	M			gpd	2121	2127	1792	1824	1712	2044	3861	4732	3535	2378	2555	3090	NT
Flow, Daily Max	OF 001	C	M	10000	8000	gpd	3651	2908	2905	2646	2429	3051	6039	3530	6509	3064	3317	4683	NT
pH	OF 001	C	M		5.5-10.0	SU	COMP	COMP	COMP	COMP	COMP	COMP	COMP	COMP	6.6	COMP	7.6	6.2	NT
Arsenic	OF 001	M	M	0.53		mg/L	0.00352	0.00651	0.00905	0.0029	0.0051	0.0028	0.00409	0.00204	0.0039	0.00419	0.00503	0.0041	0.00724
Fluoride	OF 001	M	M	32	17.4	mg/L	0.275	0.306	0.314	0.502	0.319	0.317	0.459	0.349	0.473	0.608	0.312	0.392	0.4
TTO	OF 001	A	A	1.37		mg/L	CERT	CERT	CERT	CERT	CERT	CERT	CERT	CERT	0.0422	CERT	CERT	CERT	<0.80
Fluoride	OF 002	M	M	32	17.4	mg/L	NT	NT	NT	NT	NT	NT	1.57	NT	NT	NT	NT	NT	1.88
Arsenic	OF 003	M	M	2.09	0.83	mg/L	0.00337	0.112	0.338	0.0194	0.00089	0.0353	0.0403	0.133	0.0123	0.695	0.0327	<.005	0.4
TSS	OF 004	M	M	61	23	mg/L	0.8	1	0.6	0.5	0.5	2	2.8	5.5	1.9	<.5	6	0.5	<5.0

Sampling Frequency: C/Continuous, D/Daily, W/Weekly, M/Monthly, Q/Quarterly, S/Semi-Annually, A/Annually, B/Batch
ND = Non Detect, NT = Not Tested, CERT = Certified
Metals reported as Total unless otherwise noted

Business Name: IMAT
Address: 12516 NE 95th St, Suite D110, Vancouver WA 98682

Last Inspection: 6/24/2025

Permit Information		Self-Monitoring Reports				Non-Compliance		Enforce	SNC?
2023-02	SIU/CIU	Date Due	Received	Date Due	Received	Date	Type		
SIC/CIU:	3674 469	4/13/2025	4/13/2025						
EFF:	11/1/2023	7/15/2025	7/14/2025						
EXP:	10/31/2028	10/15/2025	10/15/2025						
WWTP:	Salmon Creek	1/15/2026	1/14/2026						

Parameter Name	Mon Location	Sample Freq	Rpt Freq	Limits	Units	Self Jan-25	Self Feb-25	Self Mar-25	Self Apr-25	Self May-25	Self Jun-25	Self Jul-25	Self Aug-25	Self Sep-25	Self Oct-25	Self Nov-25	Self Dec-25	Alliance Oct-25
Flow, Avg Mon	OF 001	C	Q	1500	gpd	62.52	240.62	140.58	141.5	172.13	98.97	172.13	136.1	202.87	159.81	149.97	118.42	NT
Flow, Daily Max	OF 001	C	Q	R	gpd	422	1375	727	496	1038	439	518	509	471	603	873	632	NT
pH	OF 001	C	Q	6.0-9.0	SU	8.3	8.4	8.4	8.4	8.4	8.3	8.3	8.3	8.3	8.4	8.4	8.4	8
Fluoride	OF 001	M	Q	32	mg/L	0.67	0.3	0.44	0.85	0.47	0.62	0.69	0.2	0.65	1	0.63	0.37	0.78
TTO	OF 001	A	A	1.37	mg/L	CERT	CERT	CERT	CERT	CERT	CERT	CERT	CERT	CERT	CERT	CERT	CERT	<0.95

Sampling Frequency: C/Continuous, D/Daily, W/Weekly, M/Monthly, Q/Quarterly, S/Semi-Annually, A/Annually, B/Batch
ND = Non Detect, NT = Not Tested, CERT = Certified; COMP/Compliant; NCOMP/Non-Compliant
Metals reported as Total unless otherwise noted

Business Name: ProTech Industries, Inc.
Address: 14113 NE 3rd Ct, Vancouver WA 98685

Last Inspection: 7/30/2025 Next Inspection: 2026 - Annual

Permit Information		Self-Monitoring Reports		Non-Compliance	Enforce Action	SNC?
2023-03	SIU/CIU	Date Due	Received	Date	Type	
SIU/CIU:	3329 433.17	4/15/2025	4/4/2025			
EFF:	11/1/2023	7/15/2025	7/7/2025			
EXP:	10/31/2028	10/15/2025	10/13/2025			
WWTP:	Salmon Creek	1/15/2026	1/8/2026			

Parameter Name	Mon Location	Sample Freq	Rpt Freq	Limits	Units	Self Jan-25	Self Feb-25	Self Mar-25	Self Apr-25	Self May-25	Self Jun-25	Self Jul-25	Self Aug-25	Self Sep-25	Self Oct-25	Self Nov-25	Self Dec-25	Alliance Oct-25
Flow, Avg Mon	OF 001	C	Q		reported			287				352			296		298	NT
Flow, Daily Max	OF 001	C	Q		750			310				700			350		340	NT
pH	OF 001	B	Q		6.0 - 9.0			7.2				7.03			7.82		7.3	NT
TSS	OF 001	Q	Q		300			70.1				143			164		66	96
BOD	OF 001	Q	Q		1000			806				883			753		558	670
Arsenic	OF 001	Q	Q		0.53			0.00809				0.0061			0.00708		0.00616	0.0062
Cadmium	OF 001	Q	Q		0.11			<0.002				0.000222			0.000283		<0.0002	0.00008
Chromium	OF 001	Q	Q		2.77			0.0146				0.0374			0.0315		0.0117	0.0117
Copper	OF 001	Q	Q		3.38			0.0746				0.149			0.218		0.109	0.128
Cyanide	OF 001	Q	Q		0.89			<0.05				0.014			0.0133		0.0116	<0.02
Lead	OF 001	Q	Q		0.69			0.00228				0.00468			0.00453		0.00172	0.00508
Mercury	OF 001	Q	Q		0.09			0.00141				0.00254			0.00236		0.0011	<0.0002
Molybdenum	OF 001	Q	Q		0.57			0.00855				0.00581			0.00546		0.00431	0.00637
Nickel	OF 001	Q	Q		3.77			0.0588				0.024			0.0213		0.018	0.0613
Selenium	OF 001	Q	Q		0.68			<0.001				<0.001			<0.002		<0.001	<0.001
Silver	OF 001	Q	Q		0.43			<0.0002				<0.0002			<0.0002		<0.0002	<0.00002
Zinc	OF 001	Q	Q		2.61			0.324				0.489			0.617		0.197	0.222
TTO	OF 001	A	A		2.13			CERT				CERT			CERT		CERT	<0.008
ORG. Nonpolar	OF 001	Q	Q		50			<5.43				<5.05			17.5		17.3	<5.0
Phenols, Total	OF 001	Q	Q		0.6			0.022				0.023			0.025		0.025	<0.008

Sampling Frequency: C/Continuous, D/Daily, W/Weekly, M/Monthly, Q/Quarterly, S/Semi-Annually, A/Annually, B/Batch
ND = Not Detect, NT = Not Tested, CERT = Certified, COMP/Compliant, NCOMP/Non-Compliant
Metals reported as Total unless otherwise noted

Business Name: Vancouver Hauling Company (Waste Connections)
Address: 9411 NE 94th Ave, Vancouver WA 98662

Permit Information		Self-Monitoring Reports				Enforce Action	SNC?
2023-02	MIU	Date Due	Received	Date Due	Received		
SIC/CIU:	4212	4/15/2025	4/15/2025				
EFF:	4/28/2023	7/15/2025	7/11/2025				
EXP:	N/A	10/15/2025	10/7/2025				
WWTP:	Salmon Creek	1/15/2026	1/15/2026				

Parameter Name	Mon Location	Sample Freq	Rpt Freq	Daily Max	Limits Mth Avg	Inst Max	Units	Self Jan-25	Self Feb-25	Self Mar-25	Self Apr-25	Self May-25	Self Jun-25	Self Jul-25	Self Aug-25	Self Sep-25	Self Oct-25	Self Nov-25	Self Dec-25	Alliance Oct-25
Flow, Daily Max	MMH	CALC	Q		R		gpd	5255			1637			267			479			
pH	MMH	Q	Q		5.5-10.0		SU	8.09			8.85			6.77			8.87			NT
TSS	MMH	Q	Q		R		mg/L	170			427			150			230			NT
BOD	MMH	Q	Q		R		mg/L	389			717			1630			1700			NT
Arsenic	MMH	Q	Q	0.53			mg/L	0.0224			0.0762			0.0119			0.0144			NT
Cadmium	MMH	Q	Q	0.28			mg/L	0.00442			0.0136			0.0111			0.0176			NT
Chromium	MMH	Q	Q	4.05			mg/L	<0.01			0.0489			0.0343			0.0727			NT
Copper	MMH	Q	Q	3.59			mg/L	0.0784			0.285			0.416			1.23			NT
Cyanide	MMH	Q	Q	0.89			mg/L	0.0104			0.0276			0.0807			0.0367			NT
Lead	MMH	Q	Q	1.13			mg/L	0.0149			0.0621			0.0601			0.105			NT
Mercury	MMH	Q	Q	0.09			mg/L	0.00011			0.00024			0.0002			0.000121			NT
Molybdenum	MMH	Q	Q	0.57			mg/L	0.0597			0.147			0.111			0.106			NT
Nickel	MMH	Q	Q	3.77			mg/L	0.013			0.0499			0.0406			0.057			NT
Selenium	MMH	Q	Q	0.68			mg/L	<0.005			0.00118			<0.001			<0.005			NT
Silver	MMH	Q	Q	0.68			mg/L	<0.001			0.00045			0.0004			<0.001			NT
Zinc	MMH	Q	Q	3.58			mg/L	0.793			2.79			2.99			2.87			NT
O&G, Nonpolar	MMH	Q	Q	50			mg/L	19			35.7			32.7			24.7			NT

Sampling Frequency: C/Continuous, D/Daily, W/Weekly, M/Monthly, Q/Quarterly, S/Semi-Annually, A/Annually, B/Batch

ND = Non Detect, NT = Not Tested, CERT = Certified, COMP/Compliant, NCOMP/Non-Compliant

Metals reported as Total unless otherwise noted

CALC = estimated average daily process flows, calculated from water use data

Business Name: ICD Coatings
Address: 7350 S Union Ridge Parkway, Ridgefield, WA 98642

Permit Information		Self-Monitoring Reports				Non-Compliance		Enforce	SNCR?
LOD 2025-01	MIU	Date Due	Received	Date Due	Received	Date	Type	Action	
SIC/CIU:	N/A	7/15/2025	7/14/2025	11/15/2025	11/7/2025				
EFF:	7/1/2025	8/15/2025	8/5/2025	12/15/2025	12/6/2025				
EXP:	N/A	9/15/2025	9/12/2025	1/15/2026	1/6/2026				
WWTP:	Salmon Creek	10/15/2025	10/4/2025						

Parameter Name	Mon Location	Sample Freq	Rpt Freq	Limits		Units		Self Jan-26	Self Feb-26	Self Mar-26	Self Apr-26	Self May-26	Self Jun-26	Self Jul-25	Self Aug-25	Self Sep-25	Self Oct-25	Self Nov-25	Self Dec-25	Alliance Oct-25
				Daily Max	Mth Avg	Inst Max														
Flow, Daily Max	WCL	B	D	600	280	9	gpd							7.92	262.44	7.19	229.14	264.75	275.78	NT
pH	WCL	B	M	6	to		SU							7.92	7.84	7.19	8.21	8.07	8.83	NT
TSS	WCL	A	A	300			mg/L							NT	NT	NT	NT	<5.0	NT	NT
Copper	WCL	A	A	3.59			mg/L							NT	NT	NT	NT	NT	NT	NT
Silver	WCL	A	A	0.68			mg/L							NT	NT	NT	NT	NT	NT	NT
BOD5	WCL	A	A	240			mg/L							NT	NT	NT	NT	NT	NT	NT
TDS	WCL	A	A	N/A			mg/L							NT	NT	NT	NT	NT	NT	NT
O&G Total	WCL	A	A	50			mg/L							NT	NT	NT	NT	<5.2	NT	NT
Arsenic	WCL	A	A	0.53			mg/L							NT	NT	NT	NT	0.00217	NT	NT
Cadmium	WCL	A	A	0.28			mg/L							NT	NT	NT	NT	<0.00002	NT	NT
Copper	WCL	A	A	3.59			mg/L							NT	NT	NT	NT	0.259	NT	NT
Chromium	WCL	A	A	4.05			mg/L							NT	NT	NT	NT	0.00338	NT	NT
Lead	WCL	A	A	1.13			mg/L							NT	NT	NT	NT	<0.00004	NT	NT
Molybdenum	WCL	A	A	0.57			mg/L							NT	NT	NT	NT	0.00791	NT	NT
Mercury	WCL	A	A	0.09			mg/L							NT	NT	NT	NT	<0.0005	NT	NT
Nickel	WCL	A	A	3.77			mg/L							NT	NT	NT	NT	0.001	NT	NT
Selenium	WCL	A	A	0.68			mg/L							NT	NT	NT	NT	<0.001	NT	NT
Silver	WCL	A	A	0.68			mg/L							NT	NT	NT	NT	<0.00002	NT	NT
Zinc	WCL	A	A	3.58			mg/L							NT	NT	NT	NT	<0.002	NT	NT

Sampling Frequency: C/Continuous, D/Daily, W/Weekly, M/Monthly, Q/Quarterly, S/Semi-Annually, A/Annually, B/Batch
ND = Non Detect, NT = Not Tested, CERT = Certified; COMP/Compliant; NCOMP/Non-Compliant
Metals reported as Total unless otherwise noted
CALC = estimated average daily process flows, calculated from water use data
CD = Corrupted Data

Business Name: Oldcastle Building Envelope
Address: 1611 SE Commerce Ave, Battle Ground WA 98604

Permit Information			Self-Monitoring Reports					Non-Compliance	Enforce	SNC?
2023-01	MIU		Date Due	Received	Date Due	Received	Date Due	Date	Type	Action
SIC/CIU:	4212		2/15/2025	2/10/2025	6/15/2025	6/11/2025	10/15/2025	10/7/2025		
EFF:	4/18/2023		3/15/2025	3/8/2025	7/15/2025	7/14/2025	11/15/2025	11/11/2025		
EXP:	N/A		4/15/2025	4/6/2025	8/15/2025	8/9/2025	12/15/2025	12/6/2025		
WWTP:	Salmon Creek		5/15/2025	5/10/2025	9/15/2025	9/10/2025	1/15/2026	1/7/2026		

Parameter Name	Non Location	Sample Freq	Rpt Freq	Daily Max	Limits	Units	Self Jan-25	Self Feb-25	Self Mar-25	Self Apr-25	Self May-25	Self Jun-25	Self Jul-25	Self Aug-25	Self Sep-25	Self Oct-25	Self Nov-25	Self Dec-25	Alliance Oct-25
Flow, Daily Max	MMH	C	M	16000		gpd		10908	17089	19411	39185	20452	21335	14144	35904	48882	16181	16055	NT
pH	MMH	M	M		5.5-10.0	SU	7.6	8.5	8	8.4	8	9.2	8.2	9.2	8.9	8.3	8.3	9	NT
TSS	MMH	M	M	375		mg/L	<5.0	<5.0	<5.0	<5.0	6.8	No Sample*	<5	<5	30	3200**	270	130	NT
Copper	MMH	M	M	3.59		mg/L	0.043	0.52	0.84	0.56	0.58	No Sample*	0.47	0.44	0.35	0.13	0.1	0.24	NT
Silver	MMH	M	M	0.68		mg/L	<0.00025	<0.00025	<0.00025	<0.00025	<0.00025	No Sample*	<0.00025	<0.00025	<0.00025	0.00049	0.00045	<0.00025	NT

Sampling Frequency: C/Continuous, D/Daily, W/Weekly, M/Monthly, Q/Quarterly, S/Semi-Annually, A/Annually, B/Batch
ND = Non Detect, NT = Not Tested, CERT = Certified, COMP/Compliant; NCOMP/Non-Compliant
Metals reported as Total unless otherwise noted
CALC = estimated average daily process flows, calculated from water use data
CD = Corrupted Data. Flow monitoring malfunction, lost data for month of April.
*Lab did not show up to sample in June. See Communications in IU file.
** TSS was high do to filter press failure in October. See Communications in IU file.

APPENDIX F: Industrial User Monitoring Summary

		Sampling by POTW		Sampling by IU		Inspections	
SIU/CIU		Performed this year	Planned next year	Permit Required Sampling	Self Reporting This Year	Performed this year	Planned next year
2023-01	nLight	1	1	12	12	1	1
2023-02	IMAT	1	1	12	12	1	1
2023-03	ProTech	1	1	4	4	1	1
MIU							
2023-01	Oldcastle	0	0	12	12	0	0
2023-02	Waste Connections	0	0	4	4	0	1
2023-03	Andersen Dairy	0	0	0	0	0	0
2025-01	ICD Coatings	0	0	12	12	0	0

APPENDIX G: Fats, Oils & Grease (FOG) Program Summary

The Alliance administers a Fats, Oils and Grease (FOG) Program throughout the collection system service areas for Clark Regional Wastewater District and the City of Battle Ground. Staff inspect grease removal devices, review pump out reports, and provide education and outreach to business owners and personnel. The Alliance also participates in the Preferred Pumper Program (PPP), a regional collaboration between wastewater agencies and grease removal service providers to ensure proper maintenance of grease removal devices.

Active FOG Users	
District	352
Battle Ground	85
Total	437
<i>Change from previous year</i>	<i>16</i>

Grease Removal Device Types	
Grease Interceptors	397
Oil/Water Separators	40
Total	437
<i>Change from previous year</i>	<i>27</i>

Compliance Monitoring Activities		
Month	Facility Inspections	PPP Pumpout Reports Reviewed
January	30	33
February	54	48
March	63	24
April	41	46
May	31	57
June	33	49
July	33	59
August	37	76
September	33	70
October	29	93
November	50	93
December	30	95
TOTAL	464	743

Preferred Pumper Program Participation	
Active FOG Users currently using PPP pumper:	397
Est. gallons of FOG removed by PPP pumps:	344,258

APPENDIX H: Program Modifications

Summary of Changes during the previous Reporting Year:

No changes have been made to the approved program over the previous year.

Staff are in the process of implementing new pretreatment software. The software is currently being used for FOG management, and implementation of the pretreatment module will begin in 2026.

Summary of Planned Changes in the Upcoming Reporting Year:

The Alliance is evaluating the feasibility of accepting septage at a receiving facility at the City of Battle Ground's Operations Center. The Alliance IPP would require modification and Ecology approval before allowing septage discharge, and IPP staff are communicating with Ecology on this process.

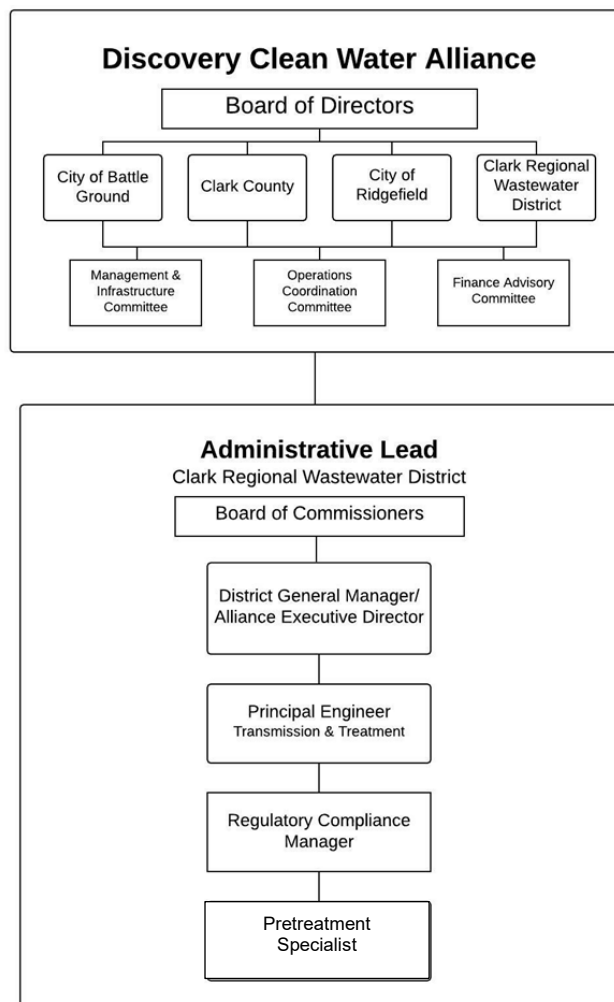
APPENDIX I: Program Resource Summary

PROGRAM ORGANIZATION & PERSONNEL

Clark Regional Wastewater District (District) administers the IPP via the Administrative Lead contract with the Alliance. The District's Regulatory Compliance Manager oversees the management and implementation of all elements of the Alliance IPP. The Pretreatment Specialist also supports the program.

PROGRAM FUNDING

The IPP is funded through the Alliance's operating budget, which is established on a biennial basis. The Alliance Members that contribute flows to the Alliance wastewater treatment facilities (District and the City of Battle Ground) pay regional service charges (RSCs) to the Alliance determined by a flow-based cost allocation framework. The RSCs fund operational and administrative costs for the Alliance, including the IPP.



APPENDIX J: Compliance & Enforcement Summary

Pretreatment Standard or Requirement	No. IUs to which Standard applies	No. IUs in compliance with Standard
IUs notified of promulgated pretreatment standards	0	-
IUs on compliance schedules	0	-
IUs required to submit baseline monitoring reports	0	-
SIUs required to submit self-monitoring reports	3	3
MIUs required to submit self-monitoring reports	3	3
IUs in Significant Non-Compliance (SNC)	0	-

Enforcement Action Type	No. Actions	SIUs	MIUs
Initial Notices	0	-	-
Letters of Non-Compliance	0	-	-
Compliance Review Meetings	0	-	-
Notices of Violation	0	-	-
Consent Orders	0	-	-
Compliance Orders	0	-	-
Emergency Suspension/Termination of Discharge	0	-	-
Civil Penalties	0	-	-