Expedited Settlement Offer Worksheet Violations Form For Wastewater

Version 1 (updated April 2019)

Consult instructions regarding eligibility criteria and procedures prior to use.

1		LEGAL NAME AND MAILING ADDRESS OF RES		NPDES Permit Numb	ber			
		James Fletcher	WA0023183					
		Mayor, City of Cashmere		Permit Effective Date:	June 1, 2020			
		101 Woodring Street		Permit Expiration Date		2024		
		Cashmere, Washington 98815		I	,			
		· , 3 · · · ·						
		LOCATION AND ADDRESS OF FACILITY		EPA Contact Name:	Vanessa Oquendo			
2		City of Cashmere Wastewater Treatment Plant		EPA Contact Title:	Compliance Officer			
		2 Riverfront Drive		EPA Office:	Region 10 - Seattle, WA			
		Cashmere, Washington 98815						
		FACILITY DESCRIPTION / CONTACT NAMES						
				Mayor James Flet	tcher with cc to current pla	int operators (Christopher		
		Name of Fa	acility Contact (ESO Worksheet recipient):	-	McMahon and Dorien Mo	cElroy)		
		Na	me of Authorized Official (40 CFR 122.22):	Mayor James Fletche	r			
			Are any findings a result of an inspection?	No				
			Inspection Date(s) (if applicable):					
3		Name of Receiving W	ater Body (Indicate whether 303(d) listed):	Wenatchee River, RM	18.6			
5		Is the entity privately owned? FLOW ADJUSTMENT FACTOR Select the appropriate average volume of flow on a day (MGD). If a facility discharges only on a period						
	_	when calculating the average flow:						
			No odivetno entito etcario enalicat					
		<0.050 mgd (no adjustment is applied)	No adjustment factor is applied.					
	B	≥0.050 mgd and <0.250 mgd	Adjustment factor of 1.5 is applied.					
	С	≥0.050 mgd and <0.250 mgd ≥0.250 mgd and <1 mgd	Adjustment factor of 1.5 is applied. Adjustment factor of 3.0 is applied.	x		3.		
	C D	≥0.050 mgd and <0.250 mgd ≥0.250 mgd and <1 mgd ≥1 mgd and <5 mgd	Adjustment factor of 1.5 is applied. Adjustment factor of 3.0 is applied. Adjustment factor of 6.0 is applied.	X		3.		
	С	≥0.050 mgd and <0.250 mgd ≥0.250 mgd and <1 mgd ≥1 mgd and <5 mgd ≥5 mgd and <10 mgd	Adjustment factor of 1.5 is applied. Adjustment factor of 3.0 is applied. Adjustment factor of 6.0 is applied. Adjustment factor of 10.0 is applied.	X		3.		
	C D E F	≥0.050 mgd and <0.250 mgd ≥0.250 mgd and <1 mgd ≥1 mgd and <5 mgd ≥5 mgd and <10 mgd ≥10 mgd and <50 mgd	Adjustment factor of 1.5 is applied.Adjustment factor of 3.0 is applied.Adjustment factor of 6.0 is applied.Adjustment factor of 10.0 is applied.Adjustment factor of 15.0 is applied.	x		3.		
	C D	≥0.050 mgd and <0.250 mgd ≥0.250 mgd and <1 mgd ≥1 mgd and <5 mgd ≥5 mgd and <10 mgd ≥10 mgd and <50 mgd	Adjustment factor of 1.5 is applied. Adjustment factor of 3.0 is applied. Adjustment factor of 6.0 is applied. Adjustment factor of 10.0 is applied.	X 		3.		
	C D E F	≥0.050 mgd and <0.250 mgd ≥0.250 mgd and <1 mgd ≥1 mgd and <5 mgd ≥5 mgd and <10 mgd ≥10 mgd and <50 mgd	Adjustment factor of 1.5 is applied.Adjustment factor of 3.0 is applied.Adjustment factor of 6.0 is applied.Adjustment factor of 10.0 is applied.Adjustment factor of 15.0 is applied.	X 		3.		
6	C D E F G	≥0.050 mgd and <0.250 mgd ≥0.250 mgd and <1 mgd ≥1 mgd and <5 mgd ≥5 mgd and <10 mgd ≥10 mgd and <50 mgd ≥50 mgd	Adjustment factor of 1.5 is applied.Adjustment factor of 3.0 is applied.Adjustment factor of 6.0 is applied.Adjustment factor of 10.0 is applied.Adjustment factor of 15.0 is applied.	X 0				
6	C D E F G	 ≥0.050 mgd and <0.250 mgd ≥0.250 mgd and <1 mgd ≥1 mgd and <5 mgd ≥5 mgd and <10 mgd ≥10 mgd and <50 mgd ≥50 mgd REPEAT VIOLATOR ADJUSTMENT FACTOR 	Adjustment factor of 1.5 is applied.Adjustment factor of 3.0 is applied.Adjustment factor of 6.0 is applied.Adjustment factor of 10.0 is applied.Adjustment factor of 15.0 is applied.Adjustment factor of 20.0 is applied.					
6	C D E F G	 ≥0.050 mgd and <0.250 mgd ≥0.250 mgd and <1 mgd ≥1 mgd and <5 mgd ≥5 mgd and <10 mgd ≥10 mgd and <50 mgd ≥50 mgd REPEAT VIOLATOR ADJUSTMENT FACTOR How many other state and federal formal enforcement actions has the responsible entity been subject to in the last three years? Include 	Adjustment factor of 1.5 is applied.Adjustment factor of 3.0 is applied.Adjustment factor of 6.0 is applied.Adjustment factor of 10.0 is applied.Adjustment factor of 15.0 is applied.Adjustment factor of 20.0 is applied.For each enforcement action, adjustment					
6	C D E F G	 ≥0.050 mgd and <0.250 mgd ≥0.250 mgd and <1 mgd ≥1 mgd and <5 mgd ≥5 mgd and <10 mgd ≥10 mgd and <50 mgd ≥50 mgd REPEAT VIOLATOR ADJUSTMENT FACTOR How many other state and federal formal enforcement actions has the responsible entity 	Adjustment factor of 1.5 is applied.Adjustment factor of 3.0 is applied.Adjustment factor of 6.0 is applied.Adjustment factor of 10.0 is applied.Adjustment factor of 15.0 is applied.Adjustment factor of 20.0 is applied.For each enforcement action, adjustment					
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6	C D E F G	 ≥0.050 mgd and <0.250 mgd ≥0.250 mgd and <1 mgd ≥1 mgd and <5 mgd ≥5 mgd and <10 mgd ≥10 mgd and <50 mgd ≥50 mgd REPEAT VIOLATOR ADJUSTMENT FACTOR How many other state and federal formal enforcement actions has the responsible entity been subject to in the last three years? Include enforcement actions at this facility and any other 	Adjustment factor of 1.5 is applied.Adjustment factor of 3.0 is applied.Adjustment factor of 6.0 is applied.Adjustment factor of 10.0 is applied.Adjustment factor of 15.0 is applied.Adjustment factor of 20.0 is applied.For each enforcement action, adjustment	0	ADJUSTMENT FACTOR	3.0		



Note	s: *	RCA = Requires Corrective Action	Violation(s) / Corrective Action(s)	CWA / Permit Citation	R C A*	No. of Viol- actions	Dollar Amount w/ Adjust. Factor		Total
7		MONITORING / REPORTING Failure to submit compliance schedule report:	ESA eligible if violations occu An annual DMR for these priority	Irred within the 2 S3.A4.b	4 mo	onths imn	nediately pri-	or to the ES	SA offer.
1	A B C	Late but less than 30 days late	pollutants would have been due by January 15, 2023 for the calendar year 2022 monitoring period. 1 count for conventional pollutant - Oil and Grease analysis conducted 1/17/23, analysis report transmitted 2/1/23. 5 counts of nonconventional pollutants (Total Nitrogen Kjeldahl, Total Nitrite+Nitrate, Total Hardness, Total Dissolved Solids) analysis conducted 1/17/23, report transmitted	55.A4.D	No	5	\$15 <u>0</u> \$225 \$450	=	\$750
8	A B C D	 Failure to submit timely discharge monitoring report (DMR) and/or DMR submitted with failure to conduct self-monitoring: DMR late but less than 30 days late DMR not submitted or DMR submitted with a failure to sample pollutants - conventional pollutants (count each conventional pollutant not reported or not sampled as a violation; BOD, TSS, pH, oil and grease, e. coli, fecal coliform) DMR not submitted or DMR submitted with a failure to sample pollutants - toxic pollutants 	No annual DMR and/or no self-monitoring conducted for priority pollutants for 2021 per Permit Part S3.A4.b "submit by January 15, 2022 and annually thereafter". An annual DMR for these priority pollutants would have been due by January 15, 2023 for the calendar year 2022 monitoring period. 2 counts missing priority pollutant analysis in report (nonconventional pollutants) - Total Cyanide and Total Phenols.	S3.A4.b	Yes	2	\$150 \$225 \$225	=	\$450
9		with permit requirements, including but no limited to required sample type, sample location, representative sampling, meeting 40 CFR 136 or other permit requirements (count each pollutant	-	S2.A	No	1	\$75	=	\$75

C Not submitted \$450 = 11 24-Hour Noncompliance Notice \$225 = A Failure to provide notice of noncompliance \$225 = B Noncompliance notice late \$150 = 12 5-Day Written Noncompliance Follow-up Report: \$225 = A Failure to provide report \$225 = B Report provide late and/or incomplete \$225 = 13 Noncompliance Not Required Within 24 Hours: \$150 = A Failure to provide report with DMR \$75 = B Report provide late and/or incomplete \$30 =	10 Failure to submit any other required report or notice (e.g., biosolids report, pretreatment report, industrial user notification, planned changes, anticipated noncompliance, anticipated bypass, etc.):	Permit Part S5.G: Failure to submit timely O&M Manual Review Letter - submitted on 4/20/23 with due date of 1/1/22.Permit Part S4.F Failure to submit Wasteload Assessment - submitted on 4/20/23 with due date of 10/1/22	S4.F, S5.G					
C Not submitted \$4450 = 11 24-Hour Noncompliance Notice \$225 = A Failure to provide notice of noncompliance \$150 = 12 5-Day Written Noncompliance Follow-up Report: \$225 = \$150 = A Failure to provide report \$225 = \$150 = B Report provide date and/or incomplete \$150 = \$300 = 13 Moncompliance Not Required Within 24 Hours: \$150 = \$300 = A Failure to provide report with DMR \$75 = \$100 = B Report provided late and/or incomplete \$11 = \$100 = 3 Moncompliance Not Required Within 24 Hours: \$100 = \$100 = A Failure to provide report with DMR \$100 = \$100 = B Report provided late and/or incomplete \$100 = \$11 OPERATIONS AND MAINTENANCE ESA eligible if violations occurred within the 24 months immediately prior to the ESA offer. 14 Failure to conduct and document self-inspection of facility (count each month with one or more missed and/or undocument dispection) \$60 = 15 Failure to identify and document corrective actions \$60 = \$60 = \$100 = <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>=</td> <td></td>							=	
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Sublotal Operations and Maintenance Violations		Sub	total Operations a	and Ma	intena	nce Violation	ıs	\$0

	EFFLUENT LIMITATIONS	ESA eligible if violations occu	irred within	the <u>12 m</u>	onth <u>s im</u>	mediately prior to	the ESA offer.
	Failure to meet effluent limitations:	Part S1.A of the permit outlines the					
Α	Months with effluent exceedance less than 40%	effluent limits for BOD, TSS, phosphorus,		No	2	\$150 =	\$3
	above the limit - conventional pollutants	pH, fecal coliform bacteria, and					
		temperature. In July of 2023, there was					
		insufficient TSS removal; the permit					
		requires 85% removal and the reported					
	fecal coliform)	value was 78.8% (missing 7.5% removal).	C1 A				
	,	In July of 2023, the facility exceeded total	51.A				
В		phosphorus with a reported value of		No	4	\$225 =	\$9
	above the limit - conventional pollutants	1.4022 kg/day and a limit of 0.64 kg/day					
	(count each conventional pollutant separately as	119% exceedance). 3/1/24 - Exceeded					
	a violation; BOD, TSS, pH, oil and grease, e. coli,	weekly average TSS with reported value of					
	fecal coliform)	69.5 mg/L and limit of 45 mg/L (54%	S1.A				
С	Manuthan Stherest and a set have the OOO/	exceedance). 3/1/24 - Exceeded monthly	0			\$300 =	
C		average TSS with reported value of 32.25				\$300 -	
	above the limit - toxic pollutants	mg/L and limit of 30 mg/L (7.5%					
	A such a sub-tanks will take to succeed the succeed	exceedance). 3/1/24 - Exceeded weekly					
	(count each toxic pollutant separately as a	geometric mean for fecal coliform with					
	violation)	reported value of 2419/100ml and limit of					
		200/100ml (1,110% exceedance). 3/1/24 -					
			S1.A				
_	Months with effluent exceedance 20% or more	reported value of 43.25mg/L (44%	51.7	No	2	\$600 =	\$1,2
E		exceedance) and limit of 30mg/L. 3/1/24 -		NO	2	\$600 =	ΦΙ, 2
	above the limit - toxic pollutants	Exceeded weekly average BOD5 with					
		reported value of 79mg/L and limit of					
	(count each toxic pollutant separately as a	45mg/L (76%). 3/1/24 - Exceeded average					
	violation)	monthly total phosphorus with reported					
		value of 2.51125kg/day and limit of					
		0.64kg/day (292% exceedance).	C1 A				
			S1.A		t Linsitet	ions Violations	<u>ቀ</u> ጋ .
			Subio				\$2,4
1	RECORDS	ESA eligible if violations occu	rred within	the 24 m	onths im	mediately prior to	the ESA offer.
	Failure to create/maintain sampling and/or analysis					\$120 =	
	records (count each month with one or more						
	failure)						
	Failure to maintain other records required by the					\$75 =	
	permit (count each month with one or more failure						
	excluding records not maintained in #22)						
	,,,,,,			Subt	otal Rec	ords Violations	
	INDUSTRIAL WASTE	ESA eligible if violations occu	irred within	the 60 m	onths im		the ESA offer.
	Failure to meet industrial waste					\$300 =	
	management/pretreatment requirement for POTWs						
	without approved pretreatment programs (excluding						
	failure to provide notice counted in #11)						
	ECONOMIC BENEFIT ESTIMATE	ESA eligible if estimated eco	nomic bene	efit of non	complia	nce is less than to	al ESA offer.
	Enter total estimate economic benefit calculated rou			3,875	- Price	ESA eligi	
	TENTERTOTAL ESTIMATE ECONOMIC DENETIL CALCULATED TOT						