

# Spill & Slug Discharge Control Plan

Real Greek LLC

**Ellenos Yogurt Facility**

*Permit No. ST 0501341*

## **General Information:**

Real Greek LLC Ellenos Yogurt

34114 21<sup>st</sup> Ave S

Federal Way, WA 98003

Emergency Contact: Elias Kasem

Title: Plant Manager

Secondary Contact: Sid Burande

Title: Plant Engineer

Work Phone: 206-535-7562

Emergency Phone: 480-601-7251

Work Phone: 206-535-7652

Emergency Phone: 607-768-8408

Type of Manufacturer: Yogurt Manufacturer with Value Added Operations

Operating Schedule:

Number of weeks operating per year: 52

Days operating: 290

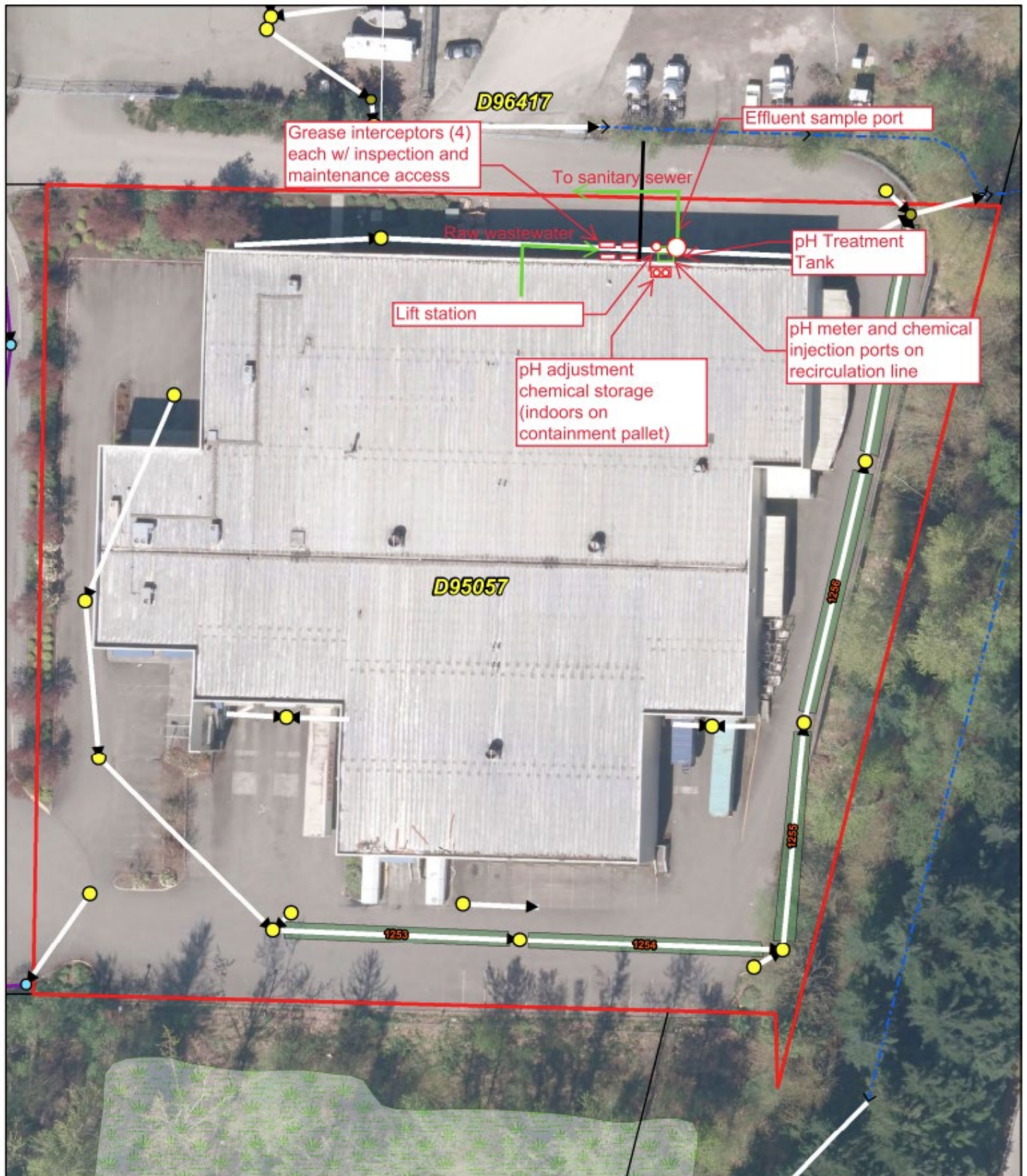
Hours per day: 16

Average Daily Discharge of wastewater: 20,000 gl.

Description of previous slugs: No previous slugs found.

Description of wastewater sources: Process water

## Facility Layout:



## **Discharge Practices:**

- A. **Routine Discharges:** Discuss each source of non-domestic wastewater discharge to the POTW. Provide the following information for each waste stream.

Wastewater source: Process: Water / Sanitation Water

Discharge Type/Frequency: Wastewater 4 days a week

Daily Discharge Volume: 20,000 gallons a day

Detail Periods of High Flow Rates: pretty consistent year round. Discharge Location: enters Lakehaven Sewer after PH treatment tank

- B. **Non-Routine Discharges:**

Any non-routine wastewaters will be characterized to ensure that it meets discharge standards and held until approval of discharge is received from the city. Should wastewater not meet standards or not be authorized for discharge, then the waste will be hauled off-site for appropriate treatment and disposal.

## **Material Inventory:**

Location	Item	Stored Volume (average)
Cold Warehouse	Liquid Milk	6,000 Gallons
Dry Storage Warehouses	Honey Liquid purees flavorings	500 Gallons

## **Potential Pollutant Inventory:**

### **Attachment 7.C**

Chemical	Classification	Quantity Stored	Chemical Use	Direct to Waste Water
F-204	Diethylene Glycol Butyl Ether	110 gallons	General equipment cleaner	YES
F-120	Sodium Metasilicate	110 gallons	Non-CIP equipment cleaner	YES
HLC-5000	Sodium Hydroxide	165 gallons	CIP caustic cleaner	YES
HDA-2500	Nitric/Phosphoric Acid	165 gallons	CIP acid cleaner	YES
LIME Sol	Phosphoric Acid	110 gallons	Calcium buildup cleaner	YES
Enviroguard Sanitizer	Hydrogen Peroxide	440 gallons	CIP and equipment sanitizer	YES
F-29	Ammonium Chloride	165 gallons	Floors/surface sanitizer	YES
Hand San	Ethanol	27 gallons	Hand sanitizer	NO
Devere	Peroxide	165 gallons	Security floor sanitizer	YES
Pure	Citric Acid	165 gallons	Sanitizing fogging system	YES
Mid Defome FG	Silicone	60 gallons	Food additive	NO
Powerfoam ALS	Chlorine	165 gallons	Stain removal in processing rooms	YES
F-364	Sodium Hydroxide	55 gallons	Mold removal on plastic pallets and utensils	YES
Conserve 65	Sodium Metasulfite	110 gallons	Restroom sinks cleaner	YES
Conserve 67	Polyethylene Glycol	55 gallons	Bathroom cleaning	YES
Security Floor Treatment	Alkali-Peroxide Powder	55 pounds	SEE DEVERE- brand name above (same)	YES
Scale Off II	Sodium EDTA	55 gallons	Milk stone removal in CIP	YES
BCDMH1	Bromine	45 gallons	Cooling Tower Biocide	NO
Clean and Protect Salt	Salt	1200 pounds	Softener salt	NO
pH Control - Caustic	Sodium Hydroxide	420 gallons	pH neutralization	YES
control - S 75	Sulfuric Acid	55 gallons	pH neutralization	YES
Saverite 95	Sodium Nitrite	35 gallons	Closed loop corrosion inhibitor	NO
Saverite BWT 114	Amomum Hydroxide	70 gallons	Condensate pH neutralizer	NO
Saverite BWT 3190	Potassium hydroxide	35 gallons	Boiler scale inhibitor	NO
Saverite BWT 600L	Sodium Hydroxide	65 gallons	Boiler alkalinity builder	NO
Saverite 815 LNE	Sodium Bisulfite	55 gallons	Boiler oxygen scavenger	NO
Saverite CTT 9120 H	Potassium Hydroxide	65 gallons	Cooling tower scale inhibitor	NO
Oxine	Sodium Hypochlorite	33 gallons	Cooling tower biocide	NO

Notes:

CIP = clean in place

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## **Notification Procedures**

Any employee who discovers a spill must notify their supervisor immediately. The supervisor will notify the plant manager. Spills and bypasses shall be reported as soon as possible to facility management. Facility management is responsible for notifying the appropriate regulatory agencies within 24 hours/immediately.

### **Types of Spills to report**

Any spill, overflow, or bypass from any portion of the collection or treatment system should be reported.

Emergency Contact List:

<b>Name/Position</b>	<b>Department</b>	<b>Home Phone</b>	<b>Cell Phone</b>
Elias Kasem/Plant Manager	Operations		480-601-7251
Sid Burande/Plant Engineer	Sanitation		607-768-8408
Jerry Lor/Maintenance Supervisor	Warehouse	360-384-6954	916-905-9308

The spill response team leader shall also notify the following regulatory agencies:

Wasshington State Ecology NW regional Office	206-594-0000
Washington State Emergency Management Division	1-800-258-5990

If a spill escapes Ellenos Yogurt Facility the publicly owned treatment works (POTW) must be notified immediately (as soon as discovered).

Facility management is responsible for completing the initial 24 hour/immediate call. Emergency contact numbers are listed below.

### **Lakehaven Sewer And Water**

Lakota Wastewater Treatment Plant  
31627 1st Ave S Federal Way WA 98003  
253 941 1516  
After Hours Emergencies:  
253-941-1516

### **Washington State Department of Ecology**

Wastewater Permit Manager: Maia Hoffman 425-507-5681

Federal Way Fire Department  
Emergencies: 911

Federal Way Police 911

## **Spill & Emergency Response Equipment:**

The Ellenos facility has a mobile spill response kit located in the boiler room, This unit is a commercially produced Spill Response Kit by ULINE and is capable of absorbing 55 gallons of oil or 76 gallons of acid or base cleaners. The main Chemical Spill Kit contains the minimum:

- 1 water resistant storage container 15 cubic feet
- 4 absorbent socks, 3" x 12'
- 5 absorbent socks, 3" x 4'
- 8 absorbent pillows, 16" x 17"
- 50 absorbent Haz-Mat fiber pads, 19" x 15"
- absorbent particulate bags, 5 lb
- 2 disposable bags
- 1 pair disposable gloves
- 1 emergency drain sealer.

This inventory is periodically checked and replenished as needed.

## **Spill Response / Immediate Action Steps Checklist:**

### **Safety of Personnel**

- Warn all persons in the immediate area
- Notify on-scene spill response team members
- Notify dock/facility by radio or by other means, if necessary
- Initiate evacuation of all non-essential personnel and equipment
- Don personal protective equipment (PPE) as needed
- Avoid skin & eye contact as with inhalation & ingestion of spilled materials
  - Be aware of flammability of spilled materials
  - Be aware of reactivity with other materials

### **Establish Safety and Security Zone**

- Refer to MSDS for product information; toxicity, flammability, etc.
- Determine the extent of the safety zone
- Secure safety zone to all unauthorized personnel
- Enforce safety inside the zone

### **Initial Assessment**

- Assess spill volume, spill movement, weather, and current conditions
- Identify local environmentally sensitive areas if applicable

### **Stop the Flow**

- Eliminate ignition sources
- Close headers and other valves, if applicable

- Relieve to slack tanks, if applicable
- Employ damage control equipment as required
- Take other actions as necessary

### **Containment**

- Contain spill or divert as necessary on land, or building with pigs and absorbent materials as needed. Prevent contamination of environmentally sensitive areas.
- If spill is too large, notify private response organization

### **Notification**

- Notify the Plant manager and other appropriate parties
- All spills: Washington Dept. of Ecology Spill Response NW Region – 1-206-649-7000

### **Cleanup**

- Ensure cleanup is done safely
- Ensure there is ample storage for recovered oil/chemical
- Properly dispose of used absorbents and recovered spill

## **Preventative Measures:**

### **Inspection & Maintenance of storage areas:**

Sanitation chemical storage inventory is inspected and documented for daily usage during operations. Storage areas are kept clean using best management practices in order to comply with HazCom 1910.1200. Chemical storage areas are inspected formally at least annually for housekeeping issues, proper labeling, and security.

### **Containment structures & equipment:**

The main chemical storage area at the facility has a spill containment area on containment pallets of more than stored Chemicals gallons. Containment pallets are used as needed within the containment area or throughout the facility. 55 gallon barrels are properly stored on containment pallets in designated storage areas. Sanitation chemicals are secured over a built-in containment. Additionally, chemicals, lubricants, cleaners, and sanitizers are stored in secured areas to limit access to these chemicals and the potential for spills. All flammable products are stored in fire proof cabinets.

### **Handling and transfer of materials:**

Only trained personnel handle and transport chemicals. Individuals involved in the transfer and handling of materials wear proper PPE. Where possible chemicals are mixed in a designated mixing area and then only the smaller, diluted vessel is taken to the work site in order to limit the potential of spilling large containers of concentrated chemicals. Again, only trained personnel .



When the transfer of drums or other large containers of chemicals are necessary they are moved by forklifts operated by trained and licensed personnel. Drums are transported on pallets for stability. Chemicals within production are moved by pallet jacks that are operated only by properly trained personnel.

### **Loading and unloading operations:**

Bulk chemical deliveries are received in main DOCK #3 area entering dry warehouse building ( Only trained personnel that participate in annual chemical training are authorized to handle deliveries or dispense chemicals and oils.

### **Control of plant site run-off:**

Any spills inside the plant could be contained in the containment pallets pits in the Chemical area and the Yogurt plant by plugging the drains or closing the outlet valve to sewer at the ph tank.

Should a slug discharge occur it will be controlled by shutting off the wastewater pump controls or disconnecting pumps. Personnel will then immediately contact a shift supervisor. Contained slug media will be addressed by dilution or an offsite reclaim contractor with appropriate equipment. Appropriate spill kits are used to contain and clean up any spills of organic materials.

### **Employee Training Program:**

Employees are trained in sampling and reporting as needed. Chemical Company Training Staff assists the yogurt facility in the training of new people or when changes occur in wastewater sampling and record keeping practices. In case of anticipated personnel turnover current employees will train replacements in sampling and record keeping practices.

Employees who are authorized to handle chemicals participate in chemical training, which includes proper chemical handling and labeling, spill prevention, and containing a slug. Chemical training occurs at least annually and any new employees that will be involved in the handling of chemicals are trained as they are brought on board.

### **Previous Slugs & Spills: None**

### **Implementation Schedule:**

There are currently no planned changes.

## Record of Annual Review & Revisions

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Change or Review No:	Date Entered	Review/Change Details	Person Entering
0	08/28/2023	Created new spill/slug plan	Brian Bright/Elias Kasem

### Record of Review:

\*See next page for copy of signatures

Date	Name (printed)	Title	Signature

## Signature Page

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**Elias Kasem /Plant Manager**

**Date**