SPOKANE COUNTY

PUBLIC WORKS DEPARTMENT

INDUSTRIAL PRETREATMENT PROGRAM

Spokane County

PUBLIC WORKS

ACCIDENTAL SPILL PREVENTION PLAN

July 2024

Submitted to:

WASHINGTON STATE DEPARTMENT OF ECOLOGY
WATER QUALITY PROGRAM
4601 N. MONROE STREET
SPOKANE, WA 99205

This page intentionally left blank.

Table of Contents

List of Tables

1. Accidental Spill Prevention Program Overview

1.1 Compliance with NPDES Permit

This document is assembled in accordance with Section S.6.A.2. of NPDES Permit Number WA0093317 (affective August 1, 2022). The section states, "The Permittee must develop and submit to Ecology for approval, an updated Accidental Spill Prevention Program by August 1, 2024. The program must include a schedule for implementation. The Ecology-approved program becomes an enforceable part of these permit conditions."

1.2 Relevance

The Spill Prevention Program shall support the goals of the Industrial Pretreatment Program:

1. To prevent Interference, defined as the introduction of pollutants into the POTW which will interfere with the operations of the treatment plant.
2. To prevent Pass Through, defined as the introduction of pollutants into the POTW which will pass through the treatment plant without receiving adequate treatment.
3. To improve opportunities to recycle and reclaim municipal and Industrial Wastewaters and sludges and prevent contamination of treatment plant sludges with certain pollutants.
4. To protect POTW workers from exposure to hazardous conditions.
5. To enable the County to comply with its National Pollutant Discharge Elimination System (NPDES) Discharge Permit conditions, sludge use and disposal requirements, and any other applicable federal or state requirements related to Pretreatment.
6. To provide for cost recovery.

1.3 Key Elements

Below are the Key Elements to a successful Accidental Spill Prevention Program (ASPP):

1. Industrial User (IU) ASPPs that outline plans and procedures for controlling batch discharges and spills, and
2. Standard procedures for IU permitting and enforcement, and for responding to IU slug loads that escape prevention.

1.4 Important Steps

Below are five steps in implementing an Accidental Spill Prevention Program:

1. Evaluate the need for Accidental Spill Prevention: Locate IUs and pollutants of concern, and potential risks associated with those sources.
2. Evaluate or improve legal authority to regulate IUs.
3. Approve IU ASPPs and monitor and inspect IUs for compliance with the plans.
4. Implement Publicly Owned Treatment Works (POTW) spill response procedures.
5. Annually review the Spill Prevention Program and update as needed. The ASPP and any supplements shall be followed throughout the term of the Permit.

1.5 References

Guidance Manual for Preventing Interference to POTWs, EPA, September 1987.

Guidelines for Prevention and Review of Facility Oil Spill Prevention Plans, Publication #92-96, Washington Department of Ecology, October 1992.

Guidance Manual for Developing Best Management Practices, (EN-336), EPA Office of Water, EPA 833-B-93-004, October 1993.

Control of Slug Loadings to POTWs Guidance Manual, (EN-335), EPA Office of Water, EPA 21W-4001, February 1991.

City of Spokane Industrial Pretreatment Program Accidental Spill Prevention Program, City of Spokane Wastewater Management Department, June 30, 2011.

2. Accidental Spill Prevention Program

2.1 General and Historical Information

2.1.1 POTW Information

Sewer service by Spokane County Public Works began in the 1970's with studies to determine impacts of wastewater in the urbanizing portions of the county. The first comprehensive wastewater management plan was in 1981. The County began a program in 1980 to eliminate septic tanks and connect customers to the County's sewer system to protect the Spokane Aquifer. Since the program began, over 46,000 customers have connected.

Spokane County owns and finances the Spokane County Regional Water Reclamation Facility (SCRWRF). Jacobs, Inc. operates, maintains, and repairs the SCRWRF for a contracted 20-year period, 2012 to 2032. Jacobs, Inc. is responsible for on-site biosolids treatment. Spokane County contracts for biosolids management with Barr Tech.

The SCRWRF is an 8 MGD membrane bioreactor treatment plant designed to comply with the Spokane River and Lake Spokane TMDL limits. The SCRWRF began operating and discharging to the Spokane River in December 2011. The second phase, projected for 2040, may expand the facility to 12 MGD, though actual SCRWRF expansion sizing and timing is not yet known. The site has been laid out for incremental expansions to eventually accommodate a 24 MGD annual average flow.

The County also owns 10 MGD of capacity at the Riverside Park Water Reclamation Facility (RPWRF) which is owned and operated by Spokane City. The RPWRF provides regional wastewater treatment for City of Spokane, and portions of Spokane County, City of Airway Heights, and Fairchild Air Force Base sewer service areas. The treatment system is operated as a public utility called the Wastewater Management Department. The RPWRF is advanced secondary treatment with tertiary membranes added in 2021.

The County-owned sewer system has more than 600 miles of sanitary sewer, requiring 34 pumping stations. The collection system is relatively new and has been built principally of PVC pipe. The system's infiltration and inflow is minimal. It is also a separated system versus the combined storm water and sewerage system found in parts of the City of Spokane. The County collection system is connected to the City of Spokane interceptor system and RPWRF. Wastewater in the County sewer collection system that is

not pumped to the SCRWRF flows to the RPWRF. Additionally, provisions have been made to allow effluent discharge from the SCRWRF to be routed back to the interceptor system and the RPWRF.

Discharge of membrane treated and disinfected effluent from the SCRWRF to the Spokane River is regulated by a National Pollutant Discharge Elimination System Permit (NPDES) as issued by Washington State Department of Ecology (WSDOE). An updated Accidental Spill Prevention Program for the Industrial Pretreatment Program is required by the SCRWRF most recent NPDES permit.

2.1.2 Pretreatment Program Information

The Spokane County Industrial Pretreatment Program was approved in 1998. Table 1 shows Users currently regulated, including Priority A Users and Priority B Users. Priority A Users are Industrial Users which either meet the requirements to be listed as a Significant Industrial User (SIU) or have a high likelihood to be listed as an SIU, at present or in the future. These industries pose a risk of spilling hazardous chemicals or slug discharging high-strength wastes. The permitted SIUs may be required to implement an Accidental Spill Prevention Plan (ASPP) and submit it to the County each permit cycle. The Users are reminded of the importance of spill prevention, containment, dry floors and emergency notification procedures during annual inspections of their facilities. Industries are informed that the ASPP procedures and equipment are designed to protect their employees, City and County of Spokane employees, the environment, and SCRWRF and RPWRF processes.

Priority B Users are industrial users with some potential to discharge pollutants to the public sewer or that are classified as “zero-discharge facilities,” and will be looked at on a case-by-case basis to determine the need for an ASPP. Additional data may be obtained through on-site inspections and interviews to determine the potential for spills.

Table 1. Priority A and B Industrial Users

Industry	Business Type	Priority	Applicable Categorical Classification for Sampling Requirements/Process Descriptions	Control Mechanism
Galaxy Compound Semiconductors, Inc.	Metal finishing	A	Metal finishing - samples per 40 CFR 433.17 and Local Limits for Copper, Lead and Cyanide	SIU/Permit
Honeywell	Metal and aluminum finishing. Nonferrous metals manufacturing and forming.	A	Metal finishing -sample per 40 CFR 433. Nonferrous metals manufacturing -sample per 40 CFR 421 and Local Limits	SIU/Permit
Kemira Water Solutions	Inorganic chemicals	A	Inorganic chemicals samples per 40CFR 415 and Local Limits	SIU/Permit
Lloyd Industries, Inc.	Metal finishing	A	Metal finishing - samples per 40 CFR 433.17 and Local Limits for Copper, Lead and Cyanide	SIU/Permit
Northwest Industrial Services - American On-Site	Not categorical	A	Not categorical - sample per Local Limits	SIU/Permit
Novation, Inc.	Metal finishing	A	Metal finishing - samples per 40 CFR 433.17 and Local Limits for Copper, Lead and Cyanide	SIU/Permit

US Wax and Polymer	Metal finishing	A	Metal finishing - samples per 40 CFR 433.17 and Local Limits for Copper, Lead and Cyanide	SIU/Permit
MacKay Manufacturing	Metal finishing	A	Metal finishing	Zero Discharge Agreement
Sterling International	Pesticide manufacturing	A	Insect attractant manufacturing	Zero Discharge Agreement
Wagstaff Engineering	Metal finishing	A	Passivation	Zero Discharge Agreement
Spur Industries	Roll bonded clad metals	B	Roll bonded clad metals, small chrome coating operation	Zero Discharge Agreement
Travis Pattern – Aluminum and Bronze Castings Division	Aluminum and bronze foundry	B	Aluminum and bronze foundry	Zero Discharge Agreement
Travis Pattern – Iron Castings Division	Iron foundry	B	Iron foundry	Maintain information in Industrial User Database
Spokane Industries	Steel foundry	B	Steel foundry	Maintain information in Industrial User Database
Keytronic	Contract Manufacturing	B	Electrical and injection molding/tooling	Maintain information in Industrial User Database
Northwest Wire EDM	Materials Cutting	B	Wire EDM, Small Hole EDM, and Waterjet cutting services	Maintain information in Industrial User Database
Spokane Stainless	Steel tank manufacturer	B	Steel tank manufacturer	Maintain information in Industrial User Database
Fibertech Industries	Fiberglass manufacturer	B	Manufacturing fiberglass reinforced plastic (FRP) panels	Maintain information in Industrial User Database
Bauen Technologies	Tool and die machining	B	Tool and die machining	Maintain information in Industrial User Database
American Alloy	Contract manufacturing	B	Laser cutting, fabrication, machining, powder coating	Maintain information in Industrial User Database
Purcell	Contract manufacturing	B	Assembles premade parts	Maintain information in Industrial User Database
Novelis	Aluminum casting R&D	B	Direct contact cooling for direct chill casting R&D	Maintain information in Industrial User Database
Utec Metals	Crane wheels and other contract parts	B	Contract manufacturing, including annealing	Maintain information in Industrial User Database
Gillingham-Best	Sawmill stacker manufacturing	B	Sawmill stacker manufacturing	Maintain information in Industrial User Database
Moco Engineering and Fabrication	Contract manufacturing	B	Metal sawing/surface milling	Maintain information in Industrial User Database
Spokane Metals	Contract manufacturing	B	Metal sawing	Maintain information in Industrial User Database
Inland NW Metallurgical	Metal processing services	B	Heat treatment and annealing	Maintain information in Industrial User Database

Central Pre-Mix	Concrete R&D	B	Concrete R&D	Maintain information in Industrial User Database
Shamrock Machining	Contract manufacturing	B	CNC machining, lathes, and mills, no chemical	Maintain information in Industrial User Database
Star Steel	Fence manufacturing	B	Fence manufacturing	Maintain information in Industrial User Database
Steeler, Inc.	Steel structure manufacturing	B	Steel structure engineering and manufacturing	Maintain information in Industrial User Database
Ecolite Manufacturing Company	Lighting manufacturing	B	Lighting manufacturing	Maintain information in Industrial User Database
Pure manufacturing and design	Tool and die supply	B	Tool and die supply	Maintain information in Industrial User Database
Servatron	Contract manufacturing	B	Contract manufacturing for the electronics industry	Maintain information in Industrial User Database
H & H Molds	Injection mold making	B	Injection mold making	Maintain information in Industrial User Database
Monaco Enterprises	Printed circuit board manufacturer	B	Printed circuit board manufacturing	Maintain information in Industrial User Database
Tate Technology	Printed circuit board manufacturer	B	Printed circuit board manufacturing	Maintain information in Industrial User Database
Hydrafab	Contract manufacturing	B	Fabrication, welding, tubing, sheet metal	Maintain information in Industrial User Database
Danielson Tool and Die	Tool and die supply	B	Tool and die supply	Maintain information in Industrial User Database
Fabtech Precision Sheet Metal	Sheet metal manufacturing and fabricating	B	Sheet metal manufacturing and fabricating	Maintain information in Industrial User Database
American CNC Fabricating	CNC Machining	B	CAD/CAM, CNC routers, laser etching, CNC mill work	Maintain information in Industrial User Database
T2 Services	Custom steel fabrication	B	Custom steel fabrication, mostly CNC	Maintain information in Industrial User Database
Pohl Spring Works	Spring manufacturing	B	Spring manufacturing	Maintain information in Industrial User Database
Component Tinning Services	Component tinning services	B	Component tinning services, lead forming, solder testing, solder baths, repackaging, testing, and custom projects.	Maintain information in Industrial User Database
Powdertech	Powder coating	B	Custom sandblasting, painting, and powder coatings	Maintain information in Industrial User Database
Skyone Aerospace	Aerospace manufacturing	B	Aerospace manufacturing and repair	Maintain information in Industrial User Database
Progress Tool and Die	Tool and die supply	B	Tool and die supply	Maintain information in Industrial User Database
All American Manufacturing	Laser engraving and consulting	B	Fiber engraving and CNC machining	Maintain information in Industrial User Database
ACME Machine Works	Contract machining	B	Milling and CNC machining	Maintain information in Industrial User Database

Central Valley Machine and Repair	Contract machining	B	Job shop machining and welding services	Maintain information in Industrial User Database
Pyrotek Incorporated	Refractory manufacturing	B	Manufacture of ceramic foam filters and refractories	Maintain information in Industrial User Database
Multifab	Thermoforming	B	Thermoforming, distribution of packing supplies	Maintain information in Industrial User Database
Stellar Injection Molding	OEM mold making	B	OEM mold making	Maintain information in Industrial User Database

Facilities that have spill incidents or are the subject of complaints received by the Industrial Pretreatment Program may also be required to develop an ASPP. The County Senior Director of Public Works (Director) may require any IU to develop and implement an ASPP. [Spokane County Code (SCC) 8.03A.0211]. Spokane County will use language in the SIU's Wastewater Discharge Permit to inform them of ASPP requirements. Non-permitted IUs that need an ASPP will be notified in writing.

Spokane County is continually examining industries as part of its Industrial Wastewater Survey (IWS). The County will issue control mechanisms in the form of permits, Industrial Discharge Agreements, Best Management Practices, and ASPP requirements to industries that have the potential to negatively affect the POTW.

2.1.3 History of Spills and Upsets

Because a portion of the County discharges wastewater to the RPWRF, past spills and upsets at that facility may have been caused by a source in the County. A history of spills and upsets at the RPWRF is summarized below.

In July 1998, there was a foam incident at RPWRF reported to the Washington State Department of Ecology. There was suspicion of a toxic loading of AFFF foam from a large fire at Sonderen Packaging, but testing failed to verify this. In February 1999, a letter of explanation was included in RPWRF's Discharge Monitoring Report. Data reports from samples that were collected at the time (wet season Plant Influent and Effluent and the Priority Pollutant Scan) were analyzed for indicators of the source of toxicity. There were no definitive conclusions made from the analysis. It is suspected that the source of the toxicity was a new industrial source outside the County limits.

In August 2010, RPWRF had an incident of upset which depleted the population of biological flora in the Plant resulting in decreased nitrification which caused a high ammonia concentration in the Plant Effluent (9.15 mg/L on Aug. 22, 2010, with a discharge limit of 6.33 mg/L). This biological flora depletion was likely caused by a toxin in the Plant Influent.

As of July 2024, no other incidents of upsets or spills have occurred. Spokane County and the City of Spokane are continually making improvements to the Industrial Pretreatment Program to prevent upsets at RPWRF and at the SCRWRF.

2.2 ASPP Legal Authority and Enforcement Procedures

Presented below are excerpts from Spokane County Code Pretreatment Ordinance (SCC), relating to ASPPs:

2.2.1.1 Definitions (8.03A.0103)

- Slug Discharge or Slug Load. Any Discharge at a flow rate or concentration, which could cause a violation of the Prohibited Discharge Standards, Categorical Standards, State requirements or Local Limits, or any Discharge of a non routine, episodic nature, including but not limited to an Accidental Spill or a non customary batch Discharge. [SCC 8.03A.0103 (BN)]
- Accidental Spill. Any spill which could lead to a Slug Discharge. [SCC 8.03A.0103(A)]
- General Prohibition. No User shall introduce or cause to be introduced into the POTW any Pollutant or Wastewater which causes Pass Through or Interference. This requirement applies to all Users of the POTW, whether or not they are subject to Categorical Pretreatment Standards or any other federal, state or local Pretreatment Standards or Requirements. [SCC 8.03A.0201(A)]

2.2.1.2 Accidental Spill/Slug Discharge Control Plans (8.03A.0211)

A. The Director may require any User to develop and implement an Accidental Spill prevention plan (ASPP) and/or Slug Control Plan, including any facilities or procedures ordered to support the same, all at the User's expense. Such plans must be submitted for approval within such time limits as ordered by the Director, generally not to exceed ninety (90) days. The User must implement the plans as approved by the Director. These requirements are cumulative with other requirements and not in the alternative.

B. An ASPP and/or Slug Discharge control plan shall address, at a minimum, the following:

   1. Description of Discharge practices, including nonroutine batch discharges;
   2. Description of stored chemicals;
   3. Procedures for immediately notifying the Director of an Accidental Spill or Slug Discharge which would violate SCC 8.03A.0201 through SCC 8.03A.204;
   4. Procedures to prevent adverse impact from an Accidental Spill and/or Slug Discharge. Such procedures include, but are not limited to, inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site runoff, worker training, building of containment structures or equipment, measures for containing toxic organic Pollutants, including solvents, and/or measures and equipment for emergency response.

      (Cross Reference: 40 CFR §403.8(f)(2)(vi). See also EPA Region 10 Accidental Spill Prevention and Guidance Manual for POTWs and non-domestic Users)

   5. Applications for ASPP and/or Slug Discharge plan approvals must be filed with the Director, upon such forms and with such information as required by the Director, signed by an Authorized Representative and certified as provided in SCC 8.03A.0305 B, and include the fee as provided in SCC 8.03A.1401.

C. An ASPP or Slug Discharge Control Plan may be incorporated into a Discharge Permit. Updates and renewals must be filed with any request for Permit transfer, modification or renewal, change at the User facility, and whenever the User knows or reasonably should know of information affecting the plan or facts upon with the plan was based. In addition, the Director evaluates the sufficiency of any ASPP and/or Slug Discharge control plan or other action to control spills or Slug Discharges and may order changes or updates as deemed necessary, including analysis or reports by a qualified engineer or other professional certification. If determined to be insufficient, the Director may develop such a plan at the User's expense. (Cross Reference: SCC 8.03A.0407)

2.2.1.3 Reporting Procedures (8.03A.0407)

A. In the case of an Accidental Spill or Slug Discharge, the User shall immediately telephone and notify the Director of the incident. This notification shall include the location of the Discharge, date and time thereof, type of waste, concentration and volume, and corrective actions taken by the User. The User must pay any costs incurred by the County to remediate the spill or Discharge, including out of pocket and in-house time and expense costs, fish kills, environmental remediation, other damages to person or property, as well as applicable fines and penalties from any regulatory agency. Service charges or costs incurred by the County shall be added to the service bill to the customer from which the Accidental Spill or Slug Discharge originated. This shall not limit any right of recovery of such damages, expenses, fines and penalties against any other responsible party.

B. Within five days following an Accidental Spill or Slug Discharge, the User shall, unless waived by the Director, submit a detailed written report describing the cause(s) of the Accidental Spill or Slug Discharge and the measures to be taken by the User to prevent similar future occurrences. All submittals under this Section must be signed as provided in SCC 8.03A.0305 A and accompanied by a review fee as provided in SCC 8.03A.1401.

C. A notice shall be permanently posted on the User's bulletin board or other prominent place advising employees who to call in the event of an Accidental Spill or Slug Discharge. Employers shall ensure that all employees who could cause or might be aware of an Accidental Spill or Slug Discharge occurring are advised of the emergency notification procedure.

2.2.1.4 Enforcement

Enforcement provisions are in 8.03A.0901 (Administrative Enforcement Process), 8.03A.0902 (Other Administrative Options), and 8.03A.1001 (Judicial Remedies). The following is a brief outline of enforcement procedures found in this section.

- SCC 8.03A.0901 (B) Notice of Violation –A written letter that requires a corrective action.
- SCC 8.03A.0902 (A) Consent Order –Establishes an agreement with the noncompliant User and includes specific action to be taken by the User to correct the problem or noncompliance within a time period specified by the document.
- SCC 8.03A.0902 (B) Show Cause Order –A User in non-compliance may be ordered to appear before the Director and show cause why a proposed enforcement action should not be taken.
- SCC 8.03A.0902 (C) Compliance Order –An order may be issued to the User responsible for violation that directs them to come into compliance within a specified time. The order may contain other requirements to minimize the amount of pollutants being discharged to the sewer.
- SCC 8.03A.0902 (D) Cease and Desist Order –May be issued to a User responsible for violation, or if past violations are likely to recur. The Director directs the User to cease and desist all violations. The User is required to immediately comply with all Pretreatment requirements and take actions to address the violation, including halting operations.
- SCC 8.03A.0903 Suspension, Termination of Service Orders –The Director may immediately suspend a User's Discharge whenever deemed necessary. Termination of utility service may be ordered under certain circumstances.
- SCC 8.03A.1001 Civil Suit –The Director may seek civil penalties of up to one thousand dollars per violation per day.
- SCC 8.03A.1002 Injunctive Relief –The Director may petition a court to seek a temporary or permanent injunction.
- SCC 8.03A.1003 Criminal Prosecution

2.3 Determining the need for IU ASPPs

1. Information about Industrial Users will be obtained through Spokane County Industrial Pretreatment Program Industrial Waste Survey.
2. To reduce the risk of spills and slug load discharges to the POTW, an Industrial User will be required to implement an ASPP if:
   a. They store hazardous materials that could be discharged to the sanitary sewer via floor drains, sumps, or other connections or
   b. They have any chemicals stored in drums, or larger storage containers that could enter the sewer or
   c. The Director determines an ASPP is necessary.
3. An Industrial User will not be required to implement an ASPP if:
   a. The facility does not store hazardous materials or
   b. The facility stores hazardous materials, but do not have floor drains, sumps, or other connections to the sanitary sewer that would allow introduction of a spill.

2.4 Notification Procedures

1. Industrial users required to have an ASPP must develop and implement it within such time limits as ordered by the Director, generally not to exceed 90 days. Either a Permit or notification letter will contain general requirements for spill prevention practices. The User will be responsible for updating and maintaining their ASPPs as necessary.

   Users not required to have an ASPP are asked to contact Spokane County in writing if the quantity or quality of their wastewater discharge changes, or if chemical inventory at their facility changes. Letters addressing particular circumstances will be addressed on a case-by-case basis.
2. The ASPP must follow the requirements specified in SCC 8.03A.0211. The County will review the ASPP for adequacy using the ASPP Review Checklist (Appendix A) as a guide. Inadequate ASPPs must be revised and resubmitted.

2.5 Coordination with Other Agencies

1. The Fire Department conducts inspections of many Industrial Users throughout Spokane County. County Public Works will notify the Fire Department of any industries that may be a fire hazard.
2. Coordination between the two departments (Fire & Public Works) during any spill event is extremely important. Responsibilities of each department will vary depending on the type of spill.
3. Coordination between the County and City of Spokane for responses to events which require emergency responses is outlined in the Multi-Jurisdictional Agreement dated January 18, 2022.
4. Jacobs, Inc. operates, maintains, and repairs the SCRWRF for an initial 20-year period. The County will coordinate with Jacobs for responses to emergency events and spill responses.

3. Spill Response Program

3.1 Involved Agencies

1. The Fire Department will be the lead agency for all spill response actions. This includes response actions to spills and fires at IU facilities, spills in the streets, and spills into the collection system.
2. Spokane County Public Works will be the support agency for response actions for spills that enter the collection system. In the event of an emergency, the City of Spokane may act as necessary in accordance with the City of Spokane and Spokane County Multijurisdictional Agreement.
3. All slug discharges of non-standard strength wastewater will be handled strictly by Spokane Public Works.

3.2 Spill Response Coordinator(s)

The operation and maintenance of Spokane County's wastewater collection and treatment system is generally performed by two operating groups: (a) a main group of County Public Works staff which is responsible for the collection and pumping system, and (b) a contracted group of staff employed by Jacobs who operate and maintain the SCRWRF. Correspondingly, spills that arise in the collection/pumping system will be addressed by the County, and spills occurring at the SCRWRF, or during biosolids hauling, will be addressed by Jacobs.

1. The primary Spill Coordinator(s)s and phone numbers are:
    a. **SCRWRF (Jacobs Facility Manager) – Anthony Benavidez – (509) 536-3703 or (509) 688-3862 *(mobile)***
    b. **Spokane County Wastewater Operations – (509) 477-1984 or (509) 710-9031 *(after hours)***
    c. County Public Works – Main Emergency Number – (509) 477-1984
    d. RPWRF (City of Spokane) – (509) 625-4600 or (509) 625-4610 or (509) 625-4615 *(after hours)*
    e. Fire Department – 911 for emergency or hazmat spills that cannot be contained

The secondary Spill Coordinator(s) are:

a. County Public Works Water Reclamation Project Manager – Hannah Thomascall – (509) 477-7575
b. County Public Works Water Programs Manager – Ben Brattebo – (509) 477-7521
c. SCRWRF (Jacobs Operations Supervisor) – Jeremy Meyer – (509) 536-3702 or (479) 979-4926 *(mobile)*
d. Fire Department designee - 532-8900 Fire Dispatch

Additional contacts include:

a. Spokane County Public Works Wastewater Supervisor – Chris Walker – (509) 477-7544
b. County Public Works Pretreatment Coordinator – Joshua Villa – (509) 477-7296
c. County Public Works Pretreatment Engineer– Mia Suhrbier – (509) 477-7177
d. County Risk Management – (509) 477-3617
e. SCRWRF (Jacobs Maintenance Supervisor) – Nathan Dahl – (509) 536-3701
f. SCRWRF (Jacobs Lead Operator) – Colin McEachran – (509) 536-3707

Other Emergency Resource Entities include:

a. Washington State Department of Emergency Management – (800) 258-5990

b. Ecology Eastern Regional Office Hazmat – (509) 329-3512
c. Spokane Regional Health Department – (509) 324-1500 *(emergency)*
d. Spokane Regional Clean Air Agency – (509) 477-4727
e. National Response Center – (800) 424-8802

2. Responsibilities of Spill Response Coordinator(s)s:
   a. Using the Spill Evaluation Form found in Appendix B, the Spill Response Coordinator(s)(s) will be responsible for:
      i. Evaluating the spill
      ii. Assessing potential dangers associated with the spill
      iii. Communicating with response personnel
      iv. Implementing response actions to contain or mitigate the dangers of the spill
      v. Determining clean up and disposal of the spilled material
      vi. After a spill event, the Spill Coordinator(s)(s) will be responsible for investigating and documenting the spill event. The results of the investigation will be used to evaluate the ASPP (and response procedures of other agencies) and determine if modifications are needed.

3.3 Training of Wastewater Management Personnel and Response Drills

1. Wastewater operations personnel and Jacobs staff will attend periodic training sessions to be put on by the Fire Department. Response drills must be initiated to further the above training.

3.3.1 Detection and Notification of Spills and Slug Discharges

1. The County can detect or be notified of spills or slug discharges from three sources:
   a. For spills that occur at the SCRWRF, there is a gas monitoring system and alarm in the SCRWRF Headworks building. This system detects hydrogen sulfide, a toxic gas, and combustible gases that may cause an explosion. SCRWRF and County personnel also have portable gas meters for these dangerous gases. Personnel use these meters before entering confined spaces, such as vaults and sewer manholes.
   b. For spills that occur at the RPWRF, there is a gas monitoring system and alarm in the RPWRF Headworks building. This system detects hydrogen sulfide, a toxic gas, and combustible gases that may cause an explosion. RPWRF personnel also have portable gas meters for these dangerous gases. Personnel use these meters before entering confined spaces, such as vaults and sewer manholes.
   c. Industrial Users responsible for the discharge providing immediate notification.
   d. Fire Department, or a witness at the spill site providing immediate notification.
2. As discussed in the Legal Authority and Enforcement Procedures section of this document and in SCC 8.03A.0407 (A), all Industrial Users are required to immediately notify the County Director/Designate of any accidental spill or slug discharge of hazardous material or Non-standard strength waste. Subsequently the Fire Department will be notified when appropriate.

3.3.2 Evaluation and Response to Spills and Slug Discharges

1. As previously indicated, the Fire Department will be the lead agency responsible for spills outside of the collection system and will evaluate the dangers of spills and the best methods for responding to spills. The Spill Response Coordinator(s)(s) will provide assistance in this evaluation if the spill could enter the sewer system. If the spill or slug discharge has already entered the sewer system, the Spill

Response Coordinator(s)(s) will evaluate the spill and determine appropriate response actions using guidance obtained from IU inspection reports and Accidental Spill Prevention Plans. Response to a spill or slug discharge, where timely detection or notification has been made, will typically begin with notification of RPWRF or SCRWRF personnel at the plant and in the collection system. The volume, type and toxicity/danger will be assessed by the lead agency so spill containment and counter measures can be implemented in the form of dilution, addition of neutralizing chemicals, ventilation, or other measures. The County fully understands that once an accidental spill or slug load occurs, it is often difficult to contain the material. In many cases, containing the spill can create an immediate upstream hazard. Accidental spills and slug loads must be handled on a case-by-case basis with different responses appropriate for each case. Protection of the County's citizens is given top priority. RPWRF and SCRWRF personnel will regularly attend safety meetings that cover proper safety practices, protective clothing, the use of respirators, explosive gas detectors, Cardio-Pulmonary Resuscitation, and Industrial First Aid.

3.4 Spill Containment and Countermeasures – Options and Equipment

1. The Fire Department has most of the equipment and technical expertise necessary to contain and collect spilled materials. The wastewater operations department has heavy equipment necessary to collect and contain some spilled materials. County Public Works may be able to use City of Spokane capabilities whenever necessary. The County has the capability of shutting down pump stations and using a vacuum truck to dispose of extremely hazardous materials at the proper disposal site (not a normal procedure). The City of Spokane and Spokane County have various sized line plugs to stop toxic wastewater in cases where immediate notification and immediate response can occur (Large flow volumes could make this procedure impractical).
2. If some of the toxic material has not entered the sewer system, containment procedures will be exercised. Treatment or disposal methods used for collected materials will be dependent on the material involved.
    a. If the material is compatible with treatment plant processes in low concentrations, it could be trickled into the RPWRF or SCRWRF.
    b. The spilled material may be able to be treated in the IU's own treatment system.
    c. Outside waste treatment and disposal firms will be contacted to handle all other materials.

3.5 Spill and Slug Discharges – Event Investigation and Documentation

1. Investigations of spill events will be conducted by the Spill Response Coordinator(s)(s) using the following procedures:
    a. Where the source of the spill or slug discharge is known, the Spill Response Coordinator(s)(s) will investigate the reason for the discharge, document the reasons, and recommend actions necessary to prevent future occurrences.
    b. Where the source of the spill or slug discharge is unknown, the Spill Response Coordinator(s) will try to locate the source of the spill and use proper follow-up procedures.
2. The County will acquire data to develop the ability to investigate and identify spill sources by cataloging information on Industrial Users by the substances, or classes of substances stored and used on site, and the location of all Industrial Users. A review of all information during a spill event will help identify potential sources which then can be examined and investigated to determine probable sources. Spokane County Public Works has detailed maps, (gas) detection meters, sight, and olfactory methods to trace many toxic materials upstream, in order to locate toxic matter. Spokane County has developed

forms for documentation of spill incidents. (See Appendix B and C.) All sampling conducted during the spill response and investigations will use proper chain-of-custody procedures and preservation techniques unless immediate testing is required for response actions. A contracted laboratory will analyze the samples using approved EPA or Standard Methods procedures.

3.6 ASPP Evaluation and Modification

1. The documentation of the spill or slug discharge event will be reviewed and evaluated to determine what actions are necessary to prevent occurrence of future problems and necessary modifications to be undertaken by the Industrial User and/or Spokane County. Such modifications will be accomplished generally on a case-by-case basis and will follow the criteria listed below:
   a. If the spill or slug discharge came from an IU without an ASPP, then that IU will be categorized as "high risk" and required to develop and implement an ASPP.
   b. If the discharge came from an IU with an ASPP, then the IU's ASPP must be modified to prevent a future occurrence.
   c. If the IU is required to develop an ASPP or modify their ASPP, the IU will be put on a compliance schedule to ensure that the necessary actions are taken.
   d. If the discharge came from a source other than the IU, the event will be studied to determine if anything can be done to prevent or minimize future occurrences of such a discharge.
2. The County ASPP may also need to be modified to incorporate any administrative changes required to control the sources, or some elements of the response sections if the ASPP failed or was inadequate.
3. Any industrial or domestic discharger violating any of the provisions of the County's pretreatment ordinance (SCC 8.03A) by discharging or causing a discharge producing a deposit or obstruction, or causing damage to, or impairing the County's wastewater disposal system, shall be liable to the County for any expense, loss or damage caused by such violation or discharge. [SCC 08.03A.0407.A and 08.03A.0213}
4. Spokane County shall also bill the industrial or domestic discharger for the cost incurred by the County for any cleaning, repair or replacement work caused by a violation or discharge. [SCC 8.03A.1001.B]

3.7 Data Management

Prevention Component

1. Data management for the prevention component of the ASPP will be used to record the ASPP category of all Industrial Users and track their implementation of ASPPs. Also included in the data management system will be the inspection data related to IU ASPPs, documentation of any spills or slug discharges, and any modification of the IU's ASPPs. Many of the IUs that are likely sources of spills and slug discharges are already permitted. The County may include IUs not currently permitted in the database.

Response Component

1. The Response component consists of data and documentation from spill events and slug discharges as well as investigation of these events.
2. The data management system used to handle data and documentation from spill events and investigation of these events will be stored in a manual file or electronic file, designated as: "ASPP Notification". This data may also appear on an IU's file in the Industrial Waste Survey Database.

3.8 ASPP Resources

1. Spokane County Public Works staff and resources
2. Time, costs, and personnel requirements will be established as the program continues. A complete equipment list has not been established.
3. Outside Resources – see Section 3.2.
4. The Fire Department will be the lead agency for response to spills outside the collection system and will provide requested assistance for response to spills and slug discharges in the collection system. Additional outside resources will be obtained as Spokane County Public Works gains experience with its ASPP.

Appendix A: ASPP Review Checklist

Spokane County
Public Works Department
Industrial Pretreatment Program
Industrial User Accidental Spill Prevention Plan
Review Checklist

The IU ASPP should be evaluated using the following requirements criteria and checking the appropriate box/column. A check in the box in the "S" column means the ASPP Plan satisfactorily meets the requirements; "U" means the Plan unsatisfactorily meets the requirements; "A" means that additional information is needed to determine if the requirement is being met; and "N/A" means the requirement is not applicable to the Facility. The reviewer should use best engineering judgment in determining the adequateness of the Plan in meeting each requirement. Comments should be provided as appropriate.

	S	U	A	N/A
I. General Information				
Facility Name, Address, Contacts And Phone Numbers	☐	☐	☐	☐
Type of Business, Operating Schedule, Number of Employees	☐	☐	☐	☐
Daily Wastewater Discharge Flow Rate(s)	☐	☐	☐	☐
Applicable Categorical Standards	☐	☐	☐	☐
Previous Spill Events	☐	☐	☐	☐
Security and Warning Signs	☐	☐	☐	☐

Comments _____
_____
_____

II. Facility Layout and Flow Diagrams				
General Layout of Facility Showing—				
Property Boundaries	☐	☐	☐	☐
Entrance and Exit Routes	☐	☐	☐	☐
Manufacturing Areas	☐	☐	☐	☐

II. (Con't)

	S	U	A	N/A
Hazardous Materials Process & Storage Areas				
Waste Handling, Storage and Treatment Facilities				
Loading and Unloading Area				
Drainage Direction				
Floor Drains, Pipes, Channels, And Drainage Destinations				
Flow Diagram(s) showing:				
Piping and Instrumentation				
Flow Rates				
Tanks and Capacities				
Treatment Systems				
Final Destinations of Flows				

Comments _____
_____
_____

III. Hazardous Materials Data

Hazardous Materials				
Location				
Maximum Volume				
Container Volume				
Type Container				

Comments _____
_____
_____

IV. Spill and Leak Prevention - Equipment and Procedures

Adequate Equipment in the Following Areas:				
Storage				
Loading/Unloading				
Process				

IV. (Con't)	S	U	A	N/A
Treatment				
Other Areas _____ _____				

Comments _____
_____
_____

Adequate Procedures Including the Following:

Inspections and Maintenance of Containers and Tanks				
Inspections and Maintenance of Spill Prevention and Response Equipment				
Inspections of Storage, Process Loading/Unloading Areas				
Proper Labeling				
Other Procedures Needed _____ _____				

Comments _____
_____

V. Emergency Response Equipment and Procedures

Availability of the Following Equipment				
Communication Equipment and Alarms				
Spill Containment and Control Equipment and Tools				
Spilled Materials Storage Containers				
Protective Clothing				
Respirators				
First Aid Kits				
Decontamination Equipment				
Ventilation Equipment				
Other Equipment Needed _____ _____				

V. (Con't)

S	U	A	N/A

Comments _____
_____
_____

Adequate Procedures Including the Following:	S	U	A	N/A
Notification of Responsible Facility Personnel	☐	☐	☐	☐
Chain of Command for Spill Response	☐	☐	☐	☐
Safety and First Aid Procedures	☐	☐	☐	☐
Evacuation Procedures	☐	☐	☐	☐
Notification of Outside Assistance	☐	☐	☐	☐
Spill Assessment Procedures	☐	☐	☐	☐
Spill Containment Procedures	☐	☐	☐	☐

This page intentionally left blank.

Appendix B: Spill Evaluation and Notification Log Sheet-County Copy

Spokane County
Public Works Department
Industrial Pretreatment Program
Industrial User Accidental Spill Prevention Plan

SPILL EVALUATION AND NOTIFICATION LOG SHEET
Filled out by County spill responder
(Copy—Spokane County)

Spill Information

Description of Spill_____
Location/Facility _____
Address _____
_____
Reported by _____ phone (_____)_____
Comments _____
_____

Spill Details

Time/Date _____
Spilled Material _____Amount_____
Discharged to _____
Containment in Place? (y/n)
Describe._____
Current response efforts_____
_____
_____

Hazard Evaluation

Fire Hazard _____ Explosive _____ Fumes _____
Corrosive _____
Personnel Safety Concerns: Exposure_____
Structural Danger_____
Comments_____
_____
_____

Initiation of Response

Report Received by _____
Date/Time _____

Agencies Contacted	Date/Time
_____	_____
_____	_____
_____	_____

LOG OF KEY EVENTS OF THE SPILL

(On Site, in collection system, in community, and at POTW.
Include the date, time, and action for each event.)

Notification

Response Efforts/Investigation

Control Efforts

Treatment of Contained Material

Disposal

Remedial Actions

FINAL REPORT FORM

Spill Identification (Type of spill, volume, time, date, location)

Brief Description of Incident (explanation of cause of spill)

Affect on the POTW (Documentation of pass through and interference, and POTW damages)

Summary of Chronological Events (Spill, clean-up, disposal)

ASPP Evaluation and Remedial Action (Summary of evaluation, resulting modifications and compliance schedules)

Enforcement Action (Fines and penalties, litigation for damages)

FINAL REPORT FORM (con't)

Present Status (In compliance, clean-up effort, POTW operation, enforcement efforts)

Schematic Drawing of Incident (Detail of spill site, flow)

This page intentionally left blank.

Appendix C: Spill Evaluation and Notification Log Sheet-User Copy

Spokane County
Public Works Department
Industrial Pretreatment Program
Industrial User Accidental Spill Prevention Plan

SPILL EVALUATION AND NOTIFICATION LOG SHEET
(Copy—Industrial User)

Spill Information

Description of Spill_____
Location/Facility _____
Address _____
_____
Reported by _____phone (_____)_____
Comments _____
_____

Spill Details

Time/Date _____
Spilled Material _____ Amount_____
Discharged to _____
Containment in Place ??_____
Current response efforts_____
_____
_____

Hazard Evaluation

Fire Hazard _____ Explosive _____ Fumes _____
Corrosive _____
Personnel Safety Concerns: Exposure_____
Structural Danger_____
Comments_____
_____
_____

Initiation of Response

Report Received by: _____
Date/Time _____

Agencies Contacted	Date /Time
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

LOG OF KEY EVENTS OF THE SPILL

(On Site, in collection system, in community, and at POTW.
Include the date, time, and action for each event.)

Notification:

Response Efforts/Investigation

Control Efforts

Treatment of Contained Materials

Disposal

Remedial Actions

FINAL REPORT FORM

Spill Identification (Type of spill, volume, time, date, location)

Brief Description of Incident (explanation of cause of spill)

Affect on the POTW (Documentation of pass through and interference, and POTW damages)

Summary of Chronological Events (Spill, clean-up, disposal)

ASPP Evaluation and Remedial Action (Summary of evaluation, resulting modifications and compliance schedules)

Enforcement Action (Fines and penalties, litigation for damages)

FINAL REPORT FORM (con't)

Present Status (In compliance, clean-up effort, POTW operation, enforcement efforts)

Schematic Drawing of Incident (Detail of spill site, flow)

This page intentionally left blank.