

## **Fact Sheet for State Waste Discharge Permit ST0045524**

**Romac Industries, Inc.**

**Effective Date: July 1, 2020**

### **Purpose of this fact sheet**

This fact sheet explains and documents the decisions the Department of Ecology (Ecology) made in drafting the proposed State Waste Discharge permit for Romac Industries, Inc. (Romac) that will allow discharge of wastewater to the City of Sultan wastewater treatment plant.

State law requires any commercial or industrial facility to obtain a permit before discharging waste or chemicals to municipal sanitary sewer collection and treatment systems.

There will be no public comment period for the reissuance of this proposed permit. WAC 173-216-090(5) states: "The public notification requirements do not apply for permit renewal, if there are no increases in volume or changes in characteristics of discharge beyond those previously authorized."

Romac reviewed the draft permit and fact sheet for factual accuracy. Ecology corrected any errors or omissions about the facility's location, history, product type, production rate, or discharges prior to publishing this draft fact sheet for public notice. Responses to entity review comments are included in Appendix E.

### **Summary**

Romac Industries, Inc. produces ductile iron at its Sultan foundry. To finish products, the company employs metal finishing processes which result in a discharge to the City of Sultan sewer system. The metal finishing discharges are regulated under the federal categorical metal finishing pretreatment standards for new sources, set forth in 40 CFR Part 433.17. The proposed permit includes the same limits on metals, cyanide, total toxic organics, and pH as the previous permit, with the same monitoring requirements. Overall, minimal changes are proposed in the new permit as compared with the previous permit. Ecology updated submittal and report dates.

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## **I. Introduction**

The legislature defined Ecology's authority and obligations for the wastewater discharge permit program in the Water Pollution Control law, chapter 90.48 RCW (Revised Code of Washington).

Ecology adopted rules describing how it exercises its authority:

- State waste discharge program (chapter 173-216 WAC)
- Submission of plans and reports for construction of wastewater facilities (chapter 173-240 WAC)

These rules require any industrial facility owner/operator to obtain a State Waste Discharge permit before discharging wastewater to state waters. This rule includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the state. They also help define the basis for limits on each discharge and for other performance requirements imposed by the permit.

Under the State Waste Discharge permit program and in response to a complete and accepted permit application, Ecology generally prepares a draft permit and accompanying fact sheet, and makes it available for public review before final issuance. If the volume of the discharge has not changed or if the characteristics of the discharge have not changed Ecology may choose not to issue a public notice. There will be no public comment period for the reissuance of this proposed permit. WAC 173-216-090(5) states: "The public notification requirements do not apply for permit renewal, if there are no increases in volume or changes in characteristics of discharge beyond those previously authorized."

## II. Background Information

**Table 1 General Facility Information**

Facility Information	
Applicant Name and Mailing Address	Romac Industries, Inc. 21919 20 <sup>th</sup> Avenue SE Suite 100 Bothell, WA 98021
Facility Name and Location	Romac Industries, Inc. 125 South Sultan Basin Road Sultan, WA 98294
Contact at Facility	Name: Joshua Fowler, Environmental Engineer Telephone #: (425) 951-6273
Responsible Official	Name: Tom Lochmann Title: Vice President of Operations Address: 21919 20 <sup>th</sup> Avenue SE – Bothell, WA 98021 Telephone #: (425) 951-6200
Other Contacts	Bob Gilmore, EHS Manager Telephone #: (425) 951-6479
Industrial User Type	Categorical Industrial User
Industry Type	Ductile iron foundry, metal finishing
Categorical Industry	40 CFR Part 433.17
SIC Codes	3321 (iron foundry) 3471 (metal finishing)
NAIC Codes	331511 (ductile iron foundry) 332813 (metal finishing)
Facility Location (NAD83/WGS84 reference datum)	Latitude: 47.862778 Longitude: -121.7975
Publically Owned Treatment Works (POTW) Receiving Discharge	Sultan Wastewater Treatment Plant
Discharge Location of the POTW:	Latitude: 47.85972 Longitude: -121.82056
Permit Status	
Issuance Date of Previous Permit	December 5, 2014
Permit Renewal Application Submittal Date	October 29, 2019
Ecology Acceptance of Application Date	October 31, 2019
Inspection Status	
Date of Last Inspection	February 19, 2020



**Figure 1 Aerial view of Romac Industries, Inc. Sultan facility**



**Figure 2 Map of Romac Industries, Inc. location in Sultan, WA**

## **A. Facility description**

### *Industrial processes*

Romac Industries, Inc. (Romac) operates a ductile iron foundry in Sultan, WA. The company produces ductile iron castings for both internal and external customers. Supporting activities, such as painting, drilling and tapping of certain ductile iron castings, and shipping of finished castings, also occur. The facility is divided into seven operating departments: Pattern Shop, Molding, Melting, Finishing, Cast, Warehouse, and Maintenance.

Metal is melted in two 6-ton ABB careless induction furnaces, which operate on electrical power. Charges, or the raw materials which are to be melted to create the ductile iron, are conveyed to the furnaces through one of two 12,000-pound vibratory hoppers. Material is moved to the hoppers by a 7.5-ton bridge crane. The molten iron metal is poured from the furnaces into a ladle where it is transferred to an autopour. From the autopour, the molten iron is poured into molds, which produce the castings.

Molds are created from patterns which are made in the Pattern Shop. The molds are made in one of two Disamatics or the Osborn molding machines. Cores for the molds are made by the Laempe core making machine.

After the casting is produced, it moves to the Finishing department where any necessary grinding takes place. When Finishing has completed their work, the castings go to the Cast department. Depending on the casting type, the casts are painted with Evironamel paint, drilled and tapped, or are sent directly to the Warehouse department. From there, the castings are shipped to internal or external customers.

In 2012, an electrocoating (e-coating) line was added. E-coating is a process of coating parts for corrosion resistance. The process operates at 95-98% efficiency. E-coating is a batch process. It begins with uncoated parts that are loaded onto racks and then pretreated by immersion in a tank (Tank 1) containing a cleaner-coater solution, which contains low levels of iron-phosphate and other detergents. Chemfos 51HD is the trade name of the cleaner-coater currently used, which is "a concentrated material that simultaneously removes soils and coats steel surfaces with an iron phosphate coating to improve paint adhesion and provides additional corrosion resistance". The cleaner-coater material is rinsed off in a city water bath (Tank 2), then rinsed in a deionized water bath (Tank 3). The parts are then immersed into the electrode position tank (Tank 4) to apply paint. 480 volts of direct current is applied to the tank. The positively charged paint deposits on the grounded part. Once the part is insulated with paint to the desired thickness, it is removed from

the electrode position tank. Unadhered paint is rinsed off the parts in two deionized water tanks (Tank 5 and 6), in sequence. The removed paint is reclaimed and returned to the electrode position tank. The parts then go to a curing oven where they are heated to 350 °F for 20 minutes. After curing, the parts are boxed for transportation to the other various in-house operation departments.

All six tanks in the e-coating process line have a 750-gallon capacity. The tanks are filled to approximately 75% capacity, or between 550-600 gallons. Tanks are covered when not in use. Tanks are constructed from an assortment of stainless steel, mild steel, and polypropylene/fiberglass. Secondary containment is built around the tanks.

The e-coating process was adopted only for select parts. Romac coats approximately 326,389 square feet of ductile iron per year. The paint products currently used in Tank 4 are PowerCron XP Paste CP453A and PowerCron Resin CR691B. Approximately 5 gallons and 15 gallons of the paste and resin, respectively, are added into Tank 4 on a weekly basis. Ultimately, Tank 4 is made up of 85% water and 15% coating product.

#### *Process wastewater generation and pretreatment*

Process wastewater is only generated from the e-coating process line. None of the ductile iron manufacturing processes generate wastewater. As there are no floor drains in the facility, there is minimal concern that any water that comes into contact with any of the ductile iron manufacturing processes will enter the sewer system.

The cleaner tank (Tank 1), the city water rinse (Tank 2) and deionized water rinse (Tank 3) must be renewed occasionally. When necessary, tank contents are drained into a portable 250 gallon plastic tote, in batches if necessary. Tank 1 is drained approximately every 2 months. Tanks 2 and 3 are drained biweekly, alternating tanks each week. The wastewater drained into the plastic tote is tested for pH. If necessary, pH neutralization is performed on the portable tank using sodium bicarbonate. Then, the portable tank is transported outside for discharge, into Sultan's sanitary sewer system, via a side sewer. Process wastewater generated from the e-coating line is regulated by 40 CFR Part 433.17. A diagram of the e-coating line and water flow diagram are included in Appendix D.

### **B. Discharge location to the City of Sultan**

Romac discharges pretreated process wastewater and domestic wastewater to the Sultan sanitary sewer system, and ultimately to the Sultan Wastewater Treatment Plant (WWTP). The Sultan WWTP has a capacity of 0.72 million gallons per day and provides extended aeration activated sludge for secondary treatment. Major



components include three influent screw pumps, a fine screen, oxidation ditch, two clarifiers, a solids-handling centrifuge, and UV disinfection. The Sultan WWTP discharges to the Skykomish River. Discharge from the Sultan WWTP is permitted by NPDES Permit No. WA0023302.

### C. Wastewater characterization

Romac reported the concentration of pollutants in the permit application and in discharge monitoring reports. The tabulated data represents the quality of the effluent discharged from January 1, 2015 through December 31, 2019.

**Table 2 Wastewater Characterization**

Parameter	Units	Frequency of Sample Collection	Average Value (Average of daily max value reported)	Maximum Daily Value (Maximum reported of max daily)
Flow	gpd	Daily	865.2	1370
Cadmium, total	mg/L	Monthly	0.003	0.070
Chromium, total	mg/L	Monthly	0.051	0.845
Copper, total	mg/L	Monthly	0.041	0.621
Lead, total	mg/L	Monthly	0.015	0.050
Nickel, total	mg/L	Monthly	0.021	0.339
Silver, total	mg/L	Monthly	0.010	0.050
Zinc, total	mg/L	Monthly	0.069	0.541
Cyanide, total	mg/L	2/year	0.006	0.008
Total Toxic Organic Compounds (TTO) (40 CFR Part 433) *	mg/L	2/year	N/A	0.088

Parameter	Units	Frequency of Sample Collection	Minimum Value (of all reported values)	Maximum Value (of all reported values)
pH	Standard units	Each batch	6.3	8.4

\* Romac submitted a Solvent Management Plan (also known as a toxic organic management plan), as allowed under the previous permit special condition S12 and 40 CFR 433.12, in April 2019. Since submitting the Solvent Management Plan, Romac submits a certification statement in lieu of the TTO monitoring.

#### **D. Summary of compliance with previous permit issued**

The previous permit placed effluent limits on flow, cadmium, chromium, copper, lead, nickel, silver, zinc, cyanide, and total toxic organic compounds (40 CFR Part 433).

Romac has generally complied with the effluent limits and permit conditions throughout the duration of the permit issued on December 5, 2014, except for the following violations outlined in Table 3. Ecology assessed compliance based on its review of the facility's discharge monitoring reports (DMRs) and on inspections conducted by Ecology.

**Table 3 Permit Violations**

<b>Date</b>	<b>Violation</b>
September 2015	Cadmium, monthly monitoring not complete/not conducted
September 2015	Chromium, monthly monitoring not complete/not conducted
September 2015	Copper, monthly monitoring not complete/not conducted
September 2015	Lead, monthly monitoring not complete/not conducted
September 2015	Nickel, monthly monitoring not complete/not conducted
September 2015	Silver, monthly monitoring not complete/not conducted
September 2015	Zinc, monthly monitoring not complete/not conducted
November 2015	Late monthly DMR submittal, due 12/28/2015, submitted 12/30/2015
July 2018-January 2019	Late semiannual DMR submittal, due 1/28/2019, submitted 4/3/2019
July 2018-January 2019	Cyanide, 2/year monitoring not complete/not conducted
July 2018-January 2019	TTO, 2/year monitoring not complete/not conducted

#### **E. State environmental policy act (SEPA) compliance**

State law exempts the issuance, reissuance or modification of any wastewater discharge permit from the SEPA process as long as the permit contains conditions that are no less stringent than federal and state rules and regulations (RCW 43.21C.0383). The exemption applies only to existing discharges, not to new discharges.

### **III. Proposed Permit Limits**

State regulations require that Ecology base limits in a State Waste Discharge permit on the:

- Technology and treatment methods available to treat specific pollutants (technology-based). Technology-based limits are set by the EPA and published as a

regulation. (40 CFR 400 - 471), or Ecology develops limits on a case-by-case basis (40 CFR 125.3, and RCW 90.48). Dischargers must treat wastewater using all known, available, reasonable methods of prevention, control, and treatment (AKART).

- Effects of the pollutants on the publicly-owned treatment works (POTW). Wastewater must not interfere with the operation of the POTW. Ecology considers local limits in developing permit limits.
- Applicable requirements of other local, state and federal laws.

Ecology applies the most stringent of these limits to each parameter of concern and further describes the proposed limits below.

The limits in this permit reflect information received in the application and from supporting reports (engineering, hydrogeology, monitoring, etc.). Ecology evaluated the permit application and determined the limits needed to comply with the rules adopted by the state of Washington. Ecology does not develop effluent limits for all reported pollutants. Some pollutants are not treatable at the concentrations reported, are not controllable at the source, and are not listed in regulation.

Ecology does not usually develop permit limits for pollutants not reported in the permit application but may be present in the discharge. The permit does not authorize the discharge of the non-reported pollutants. During the five-year permit term, the facility's effluent discharge conditions may change from those conditions reported in the permit application. The facility must notify Ecology if significant changes occur in any constituent. Until Ecology modifies the permit to reflect additional discharge of pollutants, a permitted facility could be violating its permit.

#### **A. Technology-based effluent limits**

Waste discharge permits issued by Ecology specify conditions requiring all available and reasonable methods of prevention, control, and treatment (AKART) of discharges to waters of the state (RCW 90.48).

The state waste discharge permit regulations include restrictions and prohibitions to protect publicly-owned sewerage systems. A facility may not discharge any wastewater having a pH less than 5.0 or greater than 11.0 or having any other corrosive property capable of causing damage or hazard to structures, equipment, or personnel unless the:

- System is specifically designed to accommodate such discharge.
- Discharge is authorized by a permit (WAC 173-216-060).

Federal regulations (40 CFR 403.5b) also prohibits the discharge of pollutants which will cause corrosive structural damage to the POTW, but in no case discharges with pH lower than 5.0, unless the collection and treatment system is designed to accommodate such discharges.

Although Romac is primarily engaged in ductile iron molding and casting, process wastewater is only generated and discharged from the e-coat (metal finishing) process line. Therefore, existing federal categorical pretreatment standards applicable to ferrous casting, found under 40 CFR Part 464.36, do not apply.

The applicable existing federal categorical limits for this facility are found under 40 CFR Part 433.17 – Metal Finishing Point Source Category, Pretreatment standards for new sources (PSNS). Meeting the following permit limits is necessary to satisfy the requirement for AKART.

**Table 4 40 CFR Part 433.17 – Metal Finishing, PSNS**

Effluent Limits			
Parameter	Units	Average Monthly	Maximum Daily
Cadmium, total	mg/L	0.07	0.11
Chromium, T	mg/L	1.71	2.77
Copper, T	mg/L	2.07	3.38
Lead, T	mg/L	0.43	0.69
Nickel, T	mg/L	2.38	3.98
Silver, T	mg/L	0.24	0.43
Zinc, T	mg/L	1.48	2.61
Cyanide, T	mg/L	0.65	1.20
Total Toxic Organics (TTO)	mg/L	N/A	2.13

#### **B. Effluent limits based on local limits**

To protect the Sultan WWTP from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, Ecology believes it necessary to impose limits for certain parameters. Ecology based these limits on local limits established by the Sultan and codified in ordinance. Ecology's pretreatment program delegation agreement with EPA includes language in which Ecology agreed to enforce limits adopted by non-delegated programs (local limits). Applicable limits for this discharge include the following:

**Table 5 Limits Based on Local Limits, City of Sultan Ordinance 13.08.050**

Effluent Limits		
Parameter	Minimum Value	Maximum Value
Cyanide	N/A	2.0 mg/L
pH	5.5 standard units	N/A

**C. Comparison of effluent limits with the previous permit issued on December 5, 2014**

**Table 6 Comparison of Effluent Limits**

Parameter	Basis of Limit	Previous Effluent Limits: Outfall # 001		Proposed Effluent Limits: Outfall # 001	
		Average Monthly	Maximum Daily	Average Monthly	Maximum Daily
Flow (gpd)		N/A	4000	No change in limits for any listed parameters.	
Cadmium, total (mg/L)	Technology	0.07	0.11		
Chromium, total (mg/L)	Technology	1.71	2.77		
Copper, total (mg/L)	Technology	2.07	3.38		
Lead, total (mg/L)	Technology	0.43	0.69		
Nickel, total (mg/L)	Technology	2.38	3.98		
Silver, total (mg/L)	Technology	0.24	0.43		
Zinc, total (mg/L)	Technology	1.48	2.61		
Cyanide, total (mg/L)	Technology	0.65	1.20		
TTO (mg/L)	Technology	N/A	2.13		
Parameter	Basis of Limit	Daily Minimum	Daily Maximum	Daily Minimum	Daily Maximum
pH (standard units)	Technology	6.0	11.0	No change in limit.	

Although federal regulation prohibits a discharge with a pH lower than 5.0, the previous permit set a more stringent daily minimum pH limit of 6.0. Romac has consistently met this limit. Therefore, the more stringent daily minimum pH limit of 6.0 standard units is proposed.

## IV. Monitoring Requirements

Ecology requires monitoring, recording, and reporting (WAC 173-216-110) to verify that the treatment process functions correctly and that the discharge complies with the permit's effluent limits.

If a facility uses a contract laboratory to monitor wastewater, it must ensure that the laboratory uses the methods and meets or exceeds the method detection levels

required by the permit. The permit describes when facilities may use alternative methods. It also describes what to do in certain situations when the laboratory encounters matrix effects. When a facility uses an alternative method as allowed by the permit, it must report the test method, detection level (DL), and quantitation level (QL) on the discharge monitoring report or in the required report.

#### **A. Lab accreditation**

Ecology requires that facilities must use a laboratory registered or accredited under the provisions of chapter 173-50 WAC, Accreditation of Environmental Laboratories, to prepare all monitoring data (with the exception of certain parameters).

#### **B. Wastewater monitoring**

Ecology details the proposed monitoring schedule under Special Condition S2. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

Per the previous permit special condition S12, and in accordance with 40 CFR 433.12, Romac submitted a solvent management plan (also known as a toxic organic management plan) on April 11, 2019. Therefore, Romac is allowed to submit a TTO monitoring waiver in lieu of the required TTO monitoring, per special condition S11. The Permittee must review the solvent management plan at least annually and modify, as necessary, to ensure no discharge of toxic organic compounds to the Sultan WWTP or to groundwater.

### **V. Other Permit Conditions**

#### **A. Reporting and recordkeeping**

Ecology based Special Condition S3 on its authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges [WAC 173-216-110 and CFR 403.12 (e),(g), and (h)].

The only proposed change to the reporting requirements from the previous permit is a requirement for Romac to upload analytical reports to WebDMR for the monthly monitoring requirements. This only applies to analysis completed by an outside laboratory. It does not apply to the more frequent pH field analysis conducted on site by Romac employees.

## **B. Operations and maintenance**

Ecology requires dischargers to take all reasonable steps to properly operate and maintain their wastewater treatment system in accordance with state regulations (WAC 173-240-080 and WAC 173-216-110).

## **C. Prohibited discharges**

Ecology prohibits certain pollutants from being discharged to the POTW. These include substances which cause pass-through or interference, pollutants which may cause damage to the POTW or harm to the POTW workers (chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (chapter 173-303 WAC).

## **D. Dilution prohibited**

Ecology prohibits the facility from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limits.

## **E. Non routine and unanticipated wastewater**

Occasionally, this facility may generate wastewater not characterized in the permit application because it is not a routine discharge and the facility did not anticipate it at the time of application. These wastes typically consist of waters used to pressure-test storage tanks or fire water systems or of leaks from drinking water systems.

The permit authorizes the discharge of non-routine and unanticipated wastewater under certain conditions. The facility must characterize these waste waters for pollutants and examine the opportunities for reuse. Depending on the nature and extent of pollutants in this wastewater and on any opportunities for reuse, Ecology may:

- Authorize the facility to discharge the water.
- Require the facility to treat the wastewater.
- Require the facility to reuse the wastewater.

## **F. Spill control plan**

This facility stores a quantity of chemicals on-site that have the potential to cause water pollution and/or interference or pass through at the receiving POTW if accidentally released. Ecology can require a facility to develop best management

plans to prevent this accidental release [Section 402(a)(1) of the Federal Water Pollution Control Act (FWPCA) and RCW 90.48.080].

Romac developed a plan for preventing the accidental release of pollutants to state waters, to the receiving treatment plant, and for minimizing damages if such a spill occurs. The proposed permit requires the facility to review the plan on an annual basis and make changes, as necessary.

#### **G. Slug discharge control plan**

Ecology determined that Romac has the potential for a batch discharge or a spill that could adversely affect the treatment plant, therefore the proposed permit requires a slug discharge control plan [(40 CFR 403.8 (f)(I) (iii)(B)(6) and (f) (2)(vi)].

Romac developed a slug discharge control plan. The proposed permit requires the facility to review the plan and make changes, as necessary.

#### **H. Toxic organic management plan**

In lieu of TTO monitoring, 40 CFR Part 133.12 allows the submission of a certification statement provided the Permittee has submitted a toxic organic management plan, also known as a solvent management plan.

Romac submitted a Solvent Management Plan (also known as a toxic organic management plan), as allowed under the previous permit special condition S12, in April 2019. Since submitting the Solvent Management Plan, Romac is authorized to submit a certification statement in lieu of the TTO monitoring. Romac must review the plan annually and make changes, as necessary.

#### **I. General conditions**

Ecology bases the standardized general conditions on state law and regulations. They are included in all state waste discharge permits issued by Ecology.

### **VI. Public Notification of Noncompliance**

Ecology may annually publish a list of all industrial users in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters in a local newspaper. Accordingly, this permit Special Condition informs the Facility that noncompliance with this permit may result in publication of the noncompliance.



## **VII. Permit Issuance Procedures**

### **A. Permit modifications**

Ecology may modify this permit to impose or change the numerical limits, if necessary to comply with changes in the pretreatment requirements, conditions in local sewer ordinances, or based on new information from sources such as inspections and effluent monitoring. It may also modify this permit to comply with new or amended state or federal regulations.

### **B. Proposed permit issuance**

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limits and conditions believed necessary to control toxics. Ecology proposes that the permit be issued for 5 years.

## **VIII. References for Text and Appendices**

Washington State Department of Ecology.

Laws and Regulations ( <https://ecology.wa.gov/About-us/How-we-operate/Laws-rules-rulemaking> )

Permit and Wastewater Related Information (<https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Water-quality-permits-guidance> )

January 2015. *Permit Writer's Manual*, Publication Number 92-109  
(<https://fortress.wa.gov/ecy/publications/SummaryPages/92109.html>)

## **Appendix A—Public Involvement Information**

Ecology proposes to reissue a permit to Romac Industries, Inc. The permit includes wastewater discharge limits and other conditions. This fact sheet describes the facility and Ecology's reasons for requiring permit conditions. The permit retains the same pollutant limits and flow levels as set in the permit issued in 2014. For a state waste discharge permit that is reissued with pollutant discharge kept at the same levels, public notice of the draft permit is not required.

WAC 173-216-090(5) states: "The public notification requirements do not apply for permit renewal, if there are no increases in volume or changes in characteristics of discharge beyond those previously authorized."

The primary author of this permit and fact sheet is Maia Hoffman.

## **Appendix B –Your Right to Appeal**

You have a right to appeal this permit to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of the final permit. The appeal process is governed by chapter 43.21B RCW and chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2) (see glossary).

To appeal you must do the following within 30 days of the date of receipt of this permit:

- File your appeal and a copy of this permit with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this permit on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

You must also comply with other applicable requirements in chapter 43.21B RCW and chapter 371-08 WAC.

### **ADDRESS AND LOCATION INFORMATION**

<b>Street Addresses</b>	<b>Mailing Addresses</b>
<b>Department of Ecology</b> Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	<b>Department of Ecology</b> Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
<b>Pollution Control Hearings Board</b> 1111 Israel RD SW STE 301 Tumwater, WA 98501	<b>Pollution Control Hearings Board</b> PO Box 40903 Olympia, WA 98504-0903

## Appendix C—Glossary

**1-DMax or 1-day maximum temperature** -- The highest water temperature reached on any given day. This measure can be obtained using calibrated maximum/minimum thermometers or continuous monitoring probes having sampling intervals of thirty minutes or less.

**7-DADMax or 7-day average of the daily maximum temperatures** -- The arithmetic average of seven consecutive measures of daily maximum temperatures. The 7-DADMax for any individual day is calculated by averaging that day's daily maximum temperature with the daily maximum temperatures of the three days prior and the three days after that date.

**Acute toxicity** --The lethal effect of a compound on an organism that occurs in a short time period, usually 48 to 96 hours.

**AKART** -- The acronym for “all known, available, and reasonable methods of prevention, control and treatment.” AKART is a technology-based approach to limiting pollutants from wastewater discharges, which requires an engineering judgment and an economic judgment. AKART must be applied to all wastes and contaminants prior to entry into waters of the state in accordance with RCW 90.48.010 and 520, WAC 173-200-030(2)(c)(ii), and WAC 173-216-110(1)(a).

**Alternate point of compliance** -- An alternative location in the groundwater from the point of compliance where compliance with the groundwater standards is measured. It may be established in the groundwater at locations some distance from the discharge source, up to, but not exceeding the property boundary and is determined on a site specific basis following an AKART analysis. An “early warning value” must be used when an alternate point is established. An alternate point of compliance must be determined and approved in accordance with WAC 173-200-060(2).

**Ambient water quality** -- The existing environmental condition of the water in a receiving water body.

**Ammonia** -- Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

**Annual average design flow (AADF** -- average of the daily flow volumes anticipated to occur over a calendar year.

**Average monthly (intermittent) discharge limit**-- The average of the measured values obtained over a calendar months time taking into account zero discharge days.

**Average monthly discharge limit** -- The average of the measured values obtained over a calendar month's time.

**Background water quality** -- The concentrations of chemical, physical, biological or radiological constituents or other characteristics in or of groundwater at a particular point in time upgradient of an activity that has not been affected by that activity, [WAC 173-200-020(3)]. Background water quality for any parameter is statistically defined as the 95% upper tolerance interval with a 95% confidence based on at least eight hydraulically upgradient water quality samples. The eight samples are collected over a period of at least one year, with no more than one sample collected during any month in a single calendar year.

**Best management practices (BMPs)** -- Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the state. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

**BOD5** -- Determining the five-day Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD5 is used in modeling to measure the reduction of dissolved oxygen in receiving waters after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD<sub>5</sub> is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

**Bypass** -- The intentional diversion of waste streams from any portion of a treatment facility.

**Categorical pretreatment standards** -- National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties, which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

**Chlorine** -- A chemical used to disinfect wastewaters of pathogens harmful to human health. It is also extremely toxic to aquatic life.

**Chronic toxicity** -- The effect of a compound on an organism over a relatively long time, often 1/10 of an organism's lifespan or more. Chronic toxicity can measure survival, reproduction or growth rates, or other parameters to measure the toxic effects of a compound or combination of compounds.

**Clean water act (CWA)** -- The federal Water Pollution Control Act enacted by Public Law 92-500, as amended by Public Laws 95-217, 95-576, 96-483, 97-117; USC 1251 et seq.

**Compliance inspection-without sampling** -- A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

**Compliance inspection-with sampling** -- A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations. In addition it includes as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Ecology may conduct additional sampling.

**Composite sample** -- A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite" (collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots).

**Construction activity** -- Clearing, grading, excavation, and any other activity, which disturbs the surface of the land. Such activities may include road building; construction of residential houses, office buildings, or industrial buildings; and demolition activity.

**Continuous monitoring** -- Uninterrupted, unless otherwise noted in the permit.

**Critical condition** -- The time during which the combination of receiving water and waste discharge conditions have the highest potential for causing toxicity in the receiving water environment. This situation usually occurs when the flow within a water body is low, thus, its ability to dilute effluent is reduced.

**Date of receipt** -- This is defined in RCW 43.21B.001(2) as five business days after the date of mailing; or the date of actual receipt, when the actual receipt date can be proven by a preponderance of the evidence. The recipient's sworn affidavit or declaration indicating the date of receipt, which is unchallenged by the agency, constitutes sufficient evidence of actual receipt. The date of actual receipt, however, may not exceed forty-five days from the date of mailing.

**Detection limit** -- The minimum concentration of a substance that can be measured and reported with 99 percent confidence that the pollutant concentration is above zero and is determined from analysis of a sample in a given matrix containing the pollutant.

**Dilution factor (DF)** -- A measure of the amount of mixing of effluent and receiving water that occurs at the boundary of the mixing zone. Expressed as the inverse of the percent effluent fraction, for example, a dilution factor of 10 means the effluent comprises 10% by volume and the receiving water 90%.

**Distribution uniformity** -- The uniformity of infiltration (or application in the case of sprinkle or trickle irrigation) throughout the field expressed as a percent relating to the average depth infiltrated in the lowest one-quarter of the area to the average depth of water infiltrated.

**Early warning value** -- The concentration of a pollutant set in accordance with WAC 173-200-070 that is a percentage of an enforcement limit. It may be established in the effluent, groundwater, surface water, the vadose zone or within the treatment process. This value acts as a trigger to detect and respond to increasing contaminant concentrations prior to the degradation of a beneficial use.

**Enforcement limit** -- The concentration assigned to a contaminant in the groundwater at the point of compliance for the purpose of regulation, [WAC 173-200-020(11)]. This limit assures that a groundwater criterion will not be exceeded and that background water quality will be protected.

**Engineering report** -- A document that thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report must contain the appropriate information required in WAC 173-240-060 or 173-240-130.

**Fecal coliform bacteria** -- Fecal coliform bacteria are used as indicators of pathogenic bacteria in the effluent that are harmful to humans. Pathogenic bacteria in wastewater discharges are controlled by disinfecting the wastewater. The presence of high numbers of fecal coliform bacteria in a water body can indicate the recent release of untreated wastewater and/or the presence of animal feces.

**Grab sample** -- A single sample or measurement taken at a specific time or over as short a period of time as is feasible.

**Groundwater** -- Water in a saturated zone or stratum beneath the surface of land or below a surface water body.

**Industrial user** -- A discharger of wastewater to the sanitary sewer that is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

**Industrial wastewater** -- Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business; from the development of any natural resource; or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated stormwater and, also, leachate from solid waste facilities.

**Interference** -- A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

- Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and

- Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

**Local limits** -- Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

**Major facility** -- A facility discharging to surface water with an EPA rating score of > 80 points based on such factors as flow volume, toxic pollutant potential, and public health impact.

**Maximum daily discharge limit** -- The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is the maximum discharge of a pollutant measured during a calendar day.

**Maximum day design flow (MDDF)** -- The largest volume of flow anticipated to occur during a one-day period, expressed as a daily average.

**Maximum month design flow (MMDF)** -- The largest volume of flow anticipated to occur during a continuous 30-day period, expressed as a daily average.

**Maximum week design flow (MWDF)** -- The largest volume of flow anticipated to occur during a continuous 7-day period, expressed as a daily average.

**Method detection level (MDL)** -- See Detection Limit.

**Minor facility** -- A facility discharging to surface water with an EPA rating score of < 80 points based on such factors as flow volume, toxic pollutant potential, and public health impact.

**Mixing zone** -- An area that surrounds an effluent discharge within which water quality criteria may be exceeded. The permit specifies the area of the authorized mixing zone that Ecology defines following procedures outlined in state regulations (chapter 173-201A WAC).

**National pollutant discharge elimination system (NPDES)** -- The NPDES (Section 402 of the Clean Water Act) is the federal wastewater permitting system for discharges to navigable waters of the United States. Many states, including the state of Washington, have been delegated the authority to issue these permits.



NPDES permits issued by Washington State permit writers are joint NPDES/State permits issued under both state and federal laws.

**pH** -- The pH of a liquid measures its acidity or alkalinity. It is the negative logarithm of the hydrogen ion concentration. A pH of 7 is defined as neutral and large variations above or below this value are considered harmful to most aquatic life.

**Pass-through** -- A discharge which exits the POTW into waters of the State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

**Peak hour design flow (PHDF)** -- The largest volume of flow anticipated to occur during a one-hour period, expressed as a daily or hourly average.

**Peak instantaneous design flow (PIDF)** -- The maximum anticipated instantaneous flow.

**Point of compliance** -- The location in the groundwater where the enforcement limit must not be exceeded and a facility must comply with the Ground Water Quality Standards. Ecology determines this limit on a site-specific basis. Ecology locates the point of compliance in the groundwater as near and directly downgradient from the pollutant source as technically, hydrogeologically, and geographically feasible, unless it approves an alternative point of compliance.

**Potential significant industrial user (PSIU)** -- A potential significant industrial user is defined as an Industrial User that does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

- a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day or;
- b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).  
Ecology may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

**Quantitation level (QL)** -- Also known as Minimum Level of Quantitation (ML) -- The lowest level at which the entire analytical system must give a recognizable signal and acceptable calibration point for the analyte. It is equivalent to the concentration of the lowest calibration standard, assuming that the lab has used all method-specified sample weights, volumes, and cleanup procedures. The QL is calculated by multiplying the MDL by 3.18 and rounding the result to the number nearest to  $(1,2, \text{or } 5) \times 10^n$ , where  $n$  is an integer. (64 FR 30417).

**ALSO GIVEN AS:**

The smallest detectable concentration of analyte greater than the Detection Limit (DL) where the accuracy (precision & bias) achieves the objectives of the intended purpose. (Report of the Federal Advisory Committee on Detection and Quantitation Approaches and Uses in Clean Water Act Programs Submitted to the US Environmental Protection Agency December 2007).

**Reasonable potential** -- A reasonable potential to cause a water quality violation, or loss of sensitive and/or important habitat.

**Responsible corporate officer** -- A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures (40 CFR 122.22).

**Sample Maximum** -- No sample may exceed this value.

**Significant industrial user (SIU) --**

- 1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N and;
- 2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority\* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement [in accordance with 40 CFR 403.8(f)(6)].

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority\* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

\*The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated POTWs or to the POTW in the case of delegated POTWs.

**Slug discharge** -- Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the POTW. This may include any pollutant released at a flow rate that may cause interference or pass through with the POTW or in any way violate the permit conditions or the POTW's regulations and local limits.

**Soil scientist** -- An individual who is registered as a Certified or Registered Professional Soil Scientist or as a Certified Professional Soil Specialist by the American Registry of Certified Professionals in Agronomy, Crops, and Soils or by the National Society of Consulting Scientists or who has the credentials for membership. Minimum requirements for eligibility are: possession of a baccalaureate, masters, or doctorate degree from a U.S. or Canadian institution with a minimum of 30 semester hours or 45 quarter hours professional core courses in agronomy, crops or soils, and have 5,3,or 1 years, respectively, of professional experience working in the area of agronomy, crops, or soils.

**Solid waste** -- All putrescible and non-putrescible solid and semisolid wastes including, but not limited to, garbage, rubbish, ashes, industrial wastes, swill, sewage sludge, demolition and construction wastes, abandoned vehicles or parts thereof, contaminated soils and contaminated dredged material, and recyclable materials.

**Soluble BOD<sub>5</sub>** -- Determining the soluble fraction of Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of soluble organic material present in an effluent that is utilized by bacteria. Although the soluble BOD<sub>5</sub> test is not specifically described in Standard Methods, filtering the raw sample through at least a 1.2 um filter prior to running the standard BOD<sub>5</sub> test is sufficient to remove the particulate organic fraction.

**State waters** -- Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

**Stormwater**--That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a stormwater drainage system into a defined surface water body, or a constructed infiltration facility.

**Technology-based effluent limit** -- A permit limit based on the ability of a treatment method to reduce the pollutant.

**Total coliform bacteria**--A microbiological test, which detects and enumerates the total coliform group of bacteria in water samples.

**Total dissolved solids**--That portion of total solids in water or wastewater that passes through a specific filter.

**Total maximum daily load (TMDL)** --A determination of the amount of pollutant that a water body can receive and still meet water quality standards.

**Total suspended solids (TSS)** -- Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

**Upset** -- An exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limits because of factors beyond the reasonable control of the Permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, lack of preventative maintenance, or careless or improper operation.

**Water quality-based effluent limit** -- A limit imposed on the concentration of an effluent parameter to prevent the concentration of that parameter from exceeding its water quality criterion after discharge into receiving waters.

## Appendix D—Process and Water Diagrams

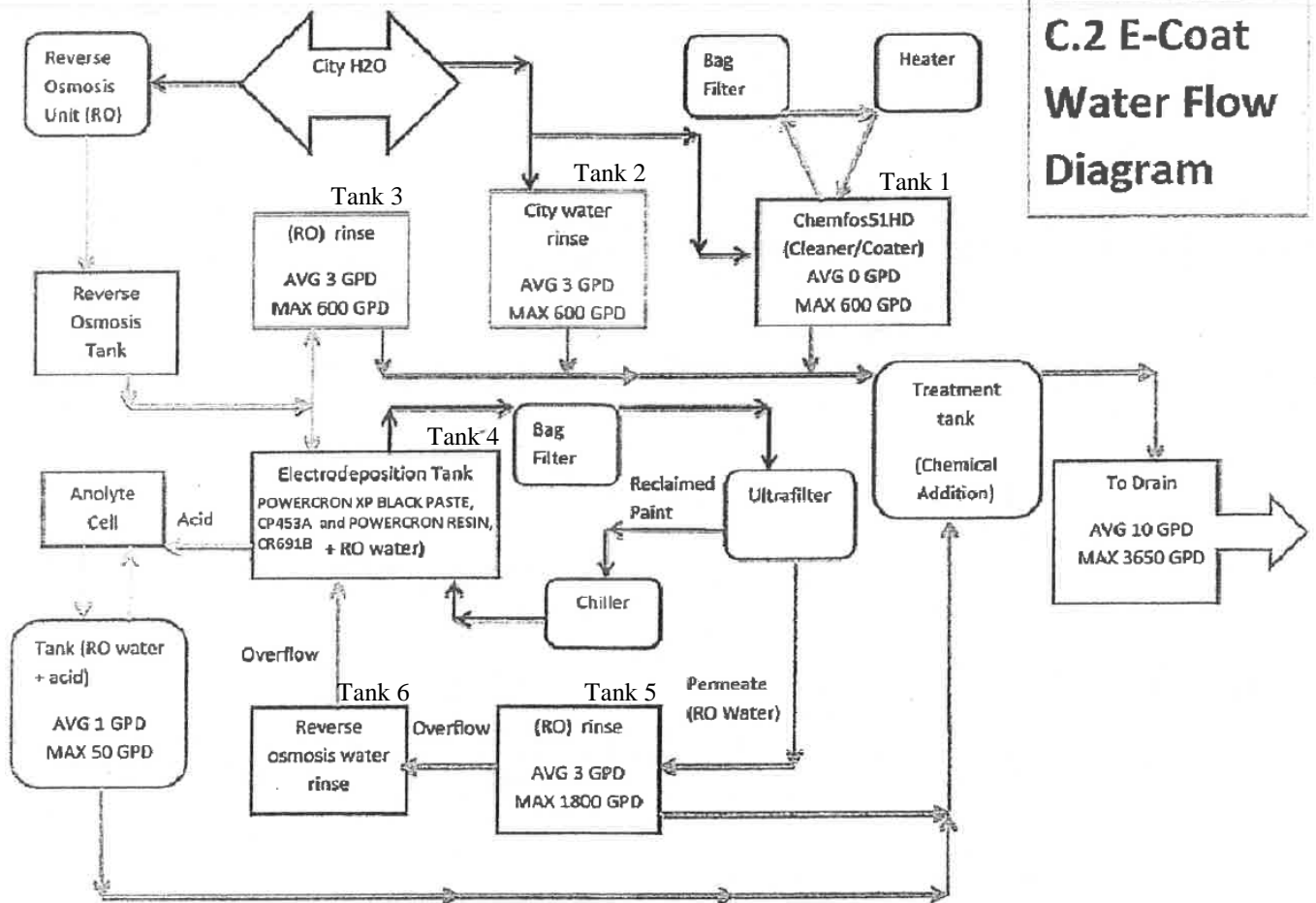
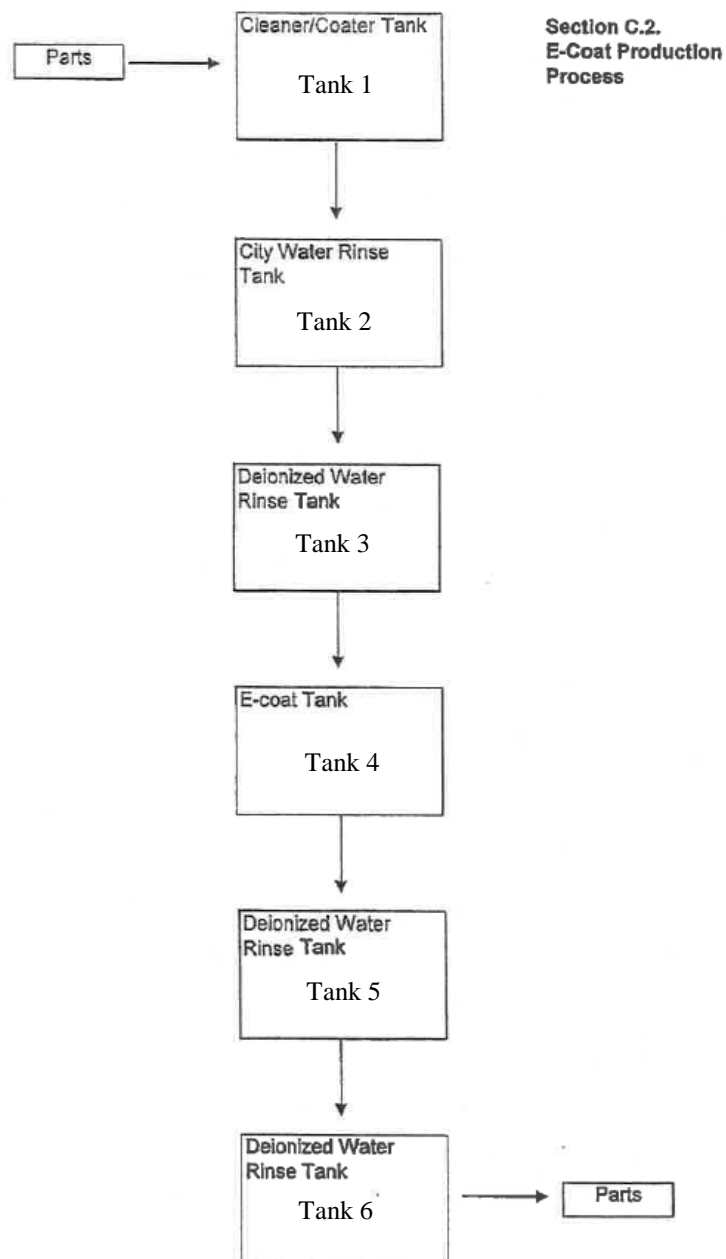


Figure 3 E-coat line water flow diagram



**Figure 4 E-coat production process**

## **Appendix E—Entity Review Comment Response**

Ecology received two substantive comments from Romac which prompted edits to the draft permit. The comments are,

### **Comment 1.**

#### **S9.A.2-Review the plan at least annually and update the spill plan as needed.**

*Romac is currently in the process of updating our HAZCOM program and that includes the facility's Spill Prevention & Response Plan (SPRP). The SPRP requires frequent inspections related to spill control and storage of any Dangerous Wastes (DW) that may be on-site. Inspections require updates, if necessary, to ensure proper storage, spill control, and documentation of any new DWs on-site. The SPRP should meet the intentions of the section related to a Spill Control Plan, but an annual review should not be necessary. Romac proposes the plan be updated and reviewed as needed similar to the requirements related to the Slug Discharge Control Plan (S10.A.2).*

### **Ecology Response**

The requirement to review the Spill Control Plan annually has been modified to “review the plan and update as needed”. Ecology agrees that the required inspections, and subsequent plan updates, as necessary to comply with Dangerous Waste regulations is protective and meets the intent of this permit condition.

### **Comment 2.**

#### **S4.A.- The Permittee must summarize wastewater treatment plant operations in the Treatment System Operating Plan (TSOP).**

*This was not a requirement of our previous permit and the majority of what is required appears to be listed in the fact sheet provided. Romac would be willing to explain this process during an inspection, but we are hesitant to provide the information in writing for proprietary reasons. Romac is by no means the authority on E-Coat, but we do implement some unique practices that separate us from our competitors.*

### **Ecology Response**

The purpose of this proposed permit condition was to meet the intent of the operations and maintenance manual requirement in WAC 173-240-150. However, this requirement

is focused on industrial wastewater facilities that include mechanical components. The treatment process at Romac is very simple, with only a pump to transfer wastewater from process tanks to the portable pretreatment tank. The facility has also shown, through continued compliance with the effluent limits and no reported spills, an exceptional ability to manage their pretreatment system. In addition, in response to this comment, Romac submitted a sampling plan and e-coat system operation and maintenance plan. Ecology believes these two documents provide proper procedures for the pretreatment system. Therefore, Ecology has removed this permit condition. Ecology will reevaluate the need to require a formal TSOP during the next permit issuance.