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WA State Department
of Ecology (SWRO)

Aziz Mahar
Southwest Regional Office
Department of Ecology
P.O. Box 47775
Olympia, WA 98504-7775

October 28, 2020

Dear Mr. Mahar,

Enclosed is the Application for a State Waste Discharge Permit to Discharge Industrial Wastewater to a Publicly Owned Treatment Works (POTW) for the Ascensus Specialties LLC facility located in Elma, WA. The facility is requesting that the following attachments be handled as confidential:

- Attachment B.1, Raw Material and Products
- Attachment C.2, Overall Facility Water Balance
- Attachment C.2.a, LSBH Process Block Diagram
- Attachment C.2.b, DSBH Process Block Diagram

The facility is requesting an increase in the permit effluent limits maximum daily discharge for oil and grease and Total Suspended Solids (TSS). The facility is requesting to increase the effluent limits to the following:

1. Maximum daily discharge for Oil and Grease 100 ug/L
2. Total Suspended Solids 80 lb./day

In the event that any sample of Oil and Grease or Total Suspended Solids exceeds the monthly average, multiple samples will be measured to ensure the process is in control and the monthly average maximums are not exceeded. The facility is not requesting an increase in the Monthly Average of any monitored parameter.

Please find the following attachments included with the application:

- B.1 Raw Materials and Products (Confidential)
- B.1.a Raw Materials and Products (Public Version)
- C.1 Operational Characteristics (Public)
- C.2 Overall Facility Water Balance (Confidential)
- C.2.a Liquid Sodium Borohydride (LSBH) Process (Confidential)
- C.2.b Dry Sodium Borohydride (DSBH) Process (Confidential)
- C.7 Incidental Materials (Public)
- E.7 Pesticide, Herbicide, Fungicide Use (Public)



E.8 Additional Parameter Measurements (Public)

F.1 Facility Site Map (Public)

Current State Waste Discharge Permit ST5037

If you have questions about the permit renewal application, please contact me at (540) 250-6865 or rreed@ascensusspecialties.com


Sincerely,

Randall A Reed
Director of Operations
Ascensus Specialties LLC

Enc.

C: Jim Starks, City of Elma

Certification Statement: I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Randall A Reed – Director of Operations



Date



Application for a State Waste Discharge Permit to Discharge Industrial Wastewater to a Publicly-Owned Treatment Works (POTW)

This application is for a state waste discharge permit for a discharge of industrial wastewater to a publicly-owned treatment works (POTW) as required by Chapter 90.48 RCW and Chapter 173-216 WAC. It is designed to provide Ecology with information on pollutants in the waste stream, materials that may enter the waste stream, and the flow characteristics of the discharge.

Ecology may request additional information to clarify the conditions of this discharge. The applicant should reference information previously submitted to Ecology that applies to this application in the appropriate section.

SECTION A. GENERAL INFORMATION

1. Applicant Name: Ascensus Specialties LLC
2. Facility Name: Elma Plant
(if different from Applicant)
3. Applicant Mail Address: 4800 State Route 12
Street
Elma, WA 98541
City/State Zip
4. Facility Location Address: (Same)
(if different from 3 above) Street

City/State Zip
5. UBI No. 6034666
63
Sometimes called a registration, tax, "C," or resale number, the Unified Business Identifier (UBI) number is a nine-digit number used to identify persons engaging in business activities. The number is assigned when a person completes a Master Business Application to register with or obtain a license from state agencies. The Departments of Revenue, Licensing, Employment Security, Labor and Industries, and the Corporations Division of the Secretary of State are among the state agencies participating in the UBI program.
6. Latitude/longitude of the facility as decimal degrees (NAD83/WGS84):
46.996944 / -123.38

FOR OFFICE USE ONLY		Check One: New/Renewal <input type="checkbox"/> Modification <input type="checkbox"/>	
Date Application Received _____	Date Fee Paid _____	Application/ Permit No. _____	Date Application Accepted _____

7. Person to contact who is familiar with the information contained in this application:

Randall Reed

Name

Site Director

Title

425-229-2293

Telephone number

360-482-4691

Fax number

8. Check One:



Permit Renewal (including renewal of temporary permits)

Does this application request a greater amount of wastewater discharge, a greater amount of pollutant discharge, or a discharge of different pollutants than specified in the last permit application for this facility? ☒ YES ☐ NO

For permit renewals, the current permit is an attachment, by reference, to this application.



Permit Modification



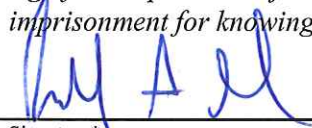
Existing Unpermitted Discharge



Proposed Discharge

Anticipated date of discharge: _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and/or imprisonment for knowing violations.



Signature*

10/28/2020

Date

Director of Operations Elma

Title

Randall A Reed

Printed Name

*Applications must be signed as follows: corporations, by a principal executive officer of at least the level of vice-president; partnership, by a general partner; sole proprietorship, by the proprietor. If these titles do not apply to your organization, the person who makes budget decisions for this facility must sign the application.

The application signatory may delegate signature authority for submittals required by the permit, such as monthly reports, to a suitable employee. You can delegate this authority to a qualified individual or to a position, which you expect to fill with a qualified individual. If you wish to delegate signature authority, please complete the following:

Signature of delegated employee

Date

Title or function at the facility

Printed name

SECTION B. PRODUCT INFORMATION

- Briefly describe all manufacturing processes and products, and/or commercial activities, at this facility. Provide the applicable Standard Industrial Category (SIC) and the North American Industry Classification System (NAICS) Code(s) for each activity (see *North American Industrial Classification System*, 2007 ed.). You can find the 1997 NAICS codes and the corresponding 1987 Standard Industry Category (SIC) codes at (<http://www.census.gov/epcd/naics/frames3.htm>).

Description: Manufacturing Process and Products, (NaBH₄ - SIC Code 2819, NAICS 325188, 2007 ed. TMB - SIC Code 2869, NAICS 325199, 2007 ed.)

Ascensus Specialties LLC Elma facility produces the following; hydrogen in a reformation process with natural gas and steam, sodium hydride (NaH) from the hydrogen, produced at the facility, and pure sodium metal, trimethylborate (TMB) from boric acid and methanol, and a liquid form of sodium borohydride (SBH) by reacting TMB with NaH. Two forms of the TMB intermediate product, a 70% azeotrope with methanol and pure TMB, are sold as products along with the main product, liquid sodium borohydride. The sodium borohydride is also extracted on site from the liquid product to produce a dry sodium borohydride product (DSBH) with sodium hydroxide produced and sold as a byproduct. DSBH is sold in three forms, powder, granules and caplets. Additionally the facility maintains the capability to produce potassium borohydride (KBH) from sodium borohydride and potassium hydroxide. An onsite WA State accredited QC laboratory provides environmental, process and product testing.

- List raw materials and products used at his facility:

Type	RAW MATERIALS	Quantity
<i>Grapes (Example)</i>		<i>1,000 tons per year</i>
See attachment B.1, Public vesion attached as B.1a		
Type	PRODUCTS	Quantity
<i>Grape Juice(Example)</i>		<i>300,000 gallons per year</i>
See attachment B.1, Public vesion attached as B.1a		

SECTION C. PLANT OPERATIONAL CHARACTERISTICS

1. For each process listed in B.1. that generates wastewater, list the process, assign the waste stream a name and an ID # and describe whether it is a batch or continuous flow.

Process	Waste Stream Name	Waste Stream ID#	Batch (B) or Continuous (C) Process
See attachment C.1			

2. On a separate sheet, produce a schematic drawing showing production processes, water flow through the facility, wastewater treatment devices and waste streams as named above. The drawing should indicate the source of intake water and show the operations contributing wastewater to the effluent. The treatment units should be labeled. Construct a water balance by showing average flows between intakes, operations, treatment units, and points of discharge to the POTW. *(See the example on page 16 of this application form.)*
3. What is the maximum daily wastewater discharge flow? 63911 gallons/day
- What is the maximum average monthly wastewater discharge flow (daily flows averaged over a month)? 34960 gallons/day
4. Describe any planned wastewater treatment improvements or changes in wastewater disposal methods, and the schedule for these improvements. *(Use additional sheets, if necessary and label as attachment C4.)*
- No wastewater treatment improvements or changes are planned.

5. If production processes are subject to seasonal variations, provide the following information. The combined value for each month should equal the estimated total monthly flow. Please indicate the proper flow unit by checking one of the following boxes:

☐ gallons per day

☐ gallons per month

☐ million gallons per month

Waste Stream ID#	MONTHS											
	J	F	M	A	M	J	J	A	S	O	N	D
Estimated Total Monthly Flow (GPD)												

6. How many hours a day does this facility typically operate? 24

How many days a week does this facility typically operate? 7

How many weeks per year does this facility typically operate? 50

7. List all incidental materials, such as oil, paint, grease, solvents, and cleaners, that are used or stored on site (*list only those with quantities greater than 10 gallons for liquids and 50 pounds for solids*). For solvents and solvent-based cleaners, include a copy of the material safety data sheet and estimate the quantity used. (*Use additional sheets, if necessary, and label as attachment C.7.*)

Materials/Quantity Stored: See attachment C.7

8. Some types of facilities are required to have spill or waste control plans. Does Yes No

this facility have:

- | | | | |
|----|---|-------------------------------------|-------------------------------------|
| a. | A spill prevention, control, and countermeasure plan (40 CFR 112)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. | An Oil Spill Contingency Plan (chapter 173-182 WAC)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. | An emergency response plan (per WAC 173-303-350)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. | A runoff, spillage, or leak control plan (per WAC 173-216-110(f))? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. | Any spill or pollution prevention plan required by local, state or federal authorities? If yes specify: <u>Site utilizes management system alternative to P2 planning as offered by DOE's HWTR Unit</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f. | A solid waste control plan? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g. | A Slug Discharge Control Plan (40 CFR 403.8(f)(2)(v))? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

SECTION D. WATER CONSUMPTION AND WATER LOSS

1. Potable water source(s):

☒ ☐ Public System (Specify) City of Elma

☐ ☐ Private Well

☐ ☐ Surface Water

a. Water Right Permit Number: _____

b. Legal Description of Water Source

_____ $\frac{1}{4}$ S, _____ $\frac{1}{4}$ E, _____, Section, _____ TWN, _____ R

2. Potable water use

a. Indicate total water use _____

Gallons per day (average) 89000

Gallons per day (maximum) 121500

b. Is water metered?

☒ YES ☐ NO

SECTION E. WASTEWATER INFORMATION

1. How are the water intake and effluent flows measured?

Intake: City water meter

Effluent Flow Meter

2. Describe the collection method for the samples analyzed below. (*i.e.*, grab, 24-hour composite). Applicants must collect grab samples (not composites) for analysis of pH, temperature, cyanide, total phenols, residual chlorine, oil and grease, fecal coliform (including *E. coli*), and Enterococci (previously known as fecal streptococcus at § 122.26 (d)(2)(iii)(A)(3)), or volatile organics.

24-hour composite

3. Has the effluent been analyzed for any other parameters than those identified in question E.4.? ☒ YES ☐ NO
If yes, attach results and label as attachment E.4. This data must clearly show the date, method and location of sampling. (*Note: Ecology may require additional testing.*)

4. Provide measurements or range of measurements for treated wastewater prior to discharge to the POTW for the parameters with an "X" in the left column. If you obtain the application from the internet, contact Ecology's regional office to see if testing for a subset of these parameters is permissible. All analyses (except pH) must be conducted by a laboratory registered or accredited by Ecology (WAC 173-216-125). If this is an application for permit renewal, provide data for the last year for those parameters that are routinely measured. For parameters measured only for this application, place the values under "Maximum." Report the values with units as specified in the parameter name or in the detection level.

The Permittee must use the specified analytical methods, detection limits (DLs) and quantitation levels (QLs) in the following table unless Ecology approves an alternate method or the method used produces measurable results in the sample and EPA has listed it as an EPA approved method in 40 CFR Part 136. If the Permittee uses an alternative method as allowed above, it must report the test method, DL, and QL on the discharge monitoring report or in the required report.

X	Parameter	Measurement Values			Number of Analyses	Analytical Method Std. Methods 19 th ,20 th edition or EPA	Detection Limit/Quantitation Level
		Minimum	Maximum	Average			
	BOD (5 day)					SM 5210 B	/2 mg/l
	COD	7.96 lb/day	202.7 lb/day	77.61 lb/day	13	SM 5220 D	/10 mg/l
	Total suspended solids	2.65 lb/day	25.04 lb/day	10.72 lb/day	13	SM 2540 D	/5 mg/l
	Fixed Dissolved Solids					SM 2540 E	
	Total dissolved solids					SM 2540 C	
	Conductivity (micromhos/cm)					SM 2510 B	
	Ammonia-N as N					SM 4500-NH ₃ C	/0.3 mg/L
	pH	6.7	8.7	8.01	13	SM 4500-H	0.1 standard units
	Fecal coliform (organisms/100 mL)					SM 9221 E or 9222 D	
	Total coliform (organisms/100 mL)					SM 9221 B or 9222 B	
	Dissolved oxygen					SM 4500-O C/G	
	Nitrate + nitrite-N as N					SM 4500-NO ₃ E	100 µg/L
	Total kjeldahl N as N					SM 4500-N _{org} C/E/FG	300 µg/l
	Ortho-phosphate-P as P					SM 4500-P E/F	10 µg/l
	Total-phosphorous-P as P					SM 4500-P E/P/F	10 µg/l
	Total Oil & grease	2 mg/L	70 mg/L	21.79 mg/l	13	EPA 1664A	1.4/5 mg/l
	NWTPH - Dx					Ecology NWTPH Dx	250/250 µg/l
	NWTPH - Gx					Ecology NWTPH Gx	250/250 µg/l
	Calcium					EPA 200.7	10 µg/l
	Chloride					SM 4500-Cl C	0.15 µg/l
	Fluoride					SM 4500-F E	.025/0.1 mg/l
	Magnesium					EPA 200.7	10/50 µg/l
	Potassium					EPA 200.7	700/ µg/l
	Sodium					EPA 200.7	29/ µg/l
	Sulfate					SM 4500-SO ₄ C/D	/200 µg/l

X	Parameter	Measurement Values			Number of Analyses	Analytical Method Std. Methods 19 th , 20 th edition or EPA	Detection Limit/Quantitation Level
		Minimum	Maximum	Average			
X	Arsenic(total)			1.1 ug/L	1	EPA 200.8	0.1/0.5 µg/l
	Barium (total)					EPA 200.8	0.5/2 µg/l
	Cadmium (total)					EPA 200.8	.05/.25 µg/l
X	Chromium (total)			4.1 ug/L	1	EPA 200.8	0.2/1 µg/l
X	Copper (total)			11 ug/L	1	EPA 200.8	0.4/2 µg/l
X	Lead (total)			6.7 ug/L	1	EPA 200.8	0.1/.5 µg/l
X	Mercury (total) pg/L			36 ng/L	1	EPA 1631E	0.2/0.5 pg/l
	Molybdenum(total)					EPA 200.8	0.1/0.5 µg/l
X	Nickel(total)			6.1 ug/L	1	EPA 200.8	0.1/0.5 µg/l
	Selenium (total)					EPA 200.8	1/1 µg/l
	Silver (total)					EPA 200.8	.04/.2 µg/l
X	Zinc (total)			94 ug/L	1	EPA 200.8	0.5/2.5 µg/l

6. Does this facility use any of the following chemicals as raw materials or produce them as part of the manufacturing process, or are they present in the wastewater? ☐ YES ☒ NO

(The number in the column next to the chemical name is the Chemical Abstract Service (CAS) reference number to aid in identifying the compound.)

If yes, specify how the chemical is used and the quantity used or produced:

METALS, CYANIDE & TOTAL PHENOLS			
Antimony, Total	7440-36-0	Nickel, Total	7440-02-0
Arsenic, Total	7440-38-2	Selenium, Total	7782-49-2
Beryllium, Total	7440-41-7	Silver, Total	7440-22-4
Cadmium, Total	7440-43-9	Thallium, Total	7440-28-0
Chromium (hex) dissolved	18540-29-9	Zinc, Total	7440-66-6
Chromium, Total	7440-47-3		
Copper, Total	7440-50-8	Cyanide, Total	57-12-5
Lead, Total	7439-92-1	Cyanide, Weak Acid Dissociable	
Mercury, Total	7439-97-6)	Phenols, Total	

PESTICIDES			
Aldrin	309-00-2	Endrin	72-20-8
alpha-BHC	319-84-6	Endrin Aldehyde	7421-93-4
beta-BHC	319-85-7	Heptachlor	76-44-8
gamma-BHC	58-89-9	Heptachlor Epoxide	1024-57-3
delta-BHC	319-86-8	PCB-1242	53469-21-9
Chlordane	57-74-9	PCB-1254	11097-69-1
4,4'-DDT	50-29-3	PCB-1221	11104-28-2
4,4'-DDE	72-55-9	PCB-1232	11141-16-5
4,4' DDD	72-54-8	PCB-1248	12672-29-6
Dieldrin	60-57-1	PCB-1260	11096-82-5
alpha-Endosulfan	959-98-8	PCB-1016	12674-11-2
beta-Endosulfan	33213-65-9	Toxaphene	8001-35-2
Endosulfan Sulfate	1031-07-8		

VOLATILE COMPOUNDS			
Acrolein	107-02-8		
Acrylonitrile	107-13-1	1,1-Dichloroethylene	75-35-4
Benzene	71-43-2	1,2-Dichloropropane	78-87-5
Bromoform	75-25-2	1,3-dichloropropene (mixed isomers) (1,2-dichloropropylene)	542-75-6
Carbon tetrachloride	56-23-5	Ethylbenzene	100-41-4
Chlorobenzene	108-90-7	Methyl bromide (Bromomethane)	74-83-9
Chloroethane	75-00-3	Methyl chloride (Chloromethane)	74-87-3
2-Chloroethylvinyl Ether	110-75-8	Methylene chloride	75-09-2
Chloroform	67-66-3	1,1,2,2-Tetrachloroethane	79-34-5
Dibromochloromethane	124-48-1	Tetrachloroethylene	127-18-4
1,2-Dichlorobenzene	95-50-1	Toluene (108-88-3)	
1,3-Dichlorobenzene	(541-73-1)	1,2-Trans-Dichloroethylene (Ethylene dichloride)	156-60-5
1,4-Dichlorobenzene	106-46-7	1,1,1-Trichloroethane	71-55-6
Dichlorobromomethane	75-27-4	1,1,2-Trichloroethane	79-00-5
1,1-Dichloroethane	75-34-3	Trichloroethylene	79-01-6
1,2-Dichloroethane	107-06-2	Vinyl chloride	75-01-4

ACID COMPOUNDS			
2-Chlorophenol	95-57-8	4-nitrophenol	100-02-7
2,4-Dichlorophenol	120-83-2	Parachlorometa cresol (4-chloro-3-methylphenol)	59-50-7
2,4-Dimethylphenol	105-67-9	Pentachlorophenol	87-86-5
4,6-dinitro-o-cresol (2-methyl-4,6,-dinitrophenol)	534-52-1	Phenol	108-95-2
2,4 dinitrophenol	51-28-5	2,4,6-Trichlorophenol	88-06-2
2-Nitrophenol	88-75-5		

BASE/NEUTRAL COMPOUNDS (compounds in bold are Ecology PBTs)			
Acenaphthene	83-32-9	3,3-Dichlorobenzidine	91-94-1
Acenaphthylene	208-96-8	Diethyl phthalate	84-66-2
Anthracene	120-12-7	Dimethyl phthalate	131-11-3
Benzidine	92-87-5	Di-n-butyl phthalate)	84-74-2
Benzyl butyl phthalate	85-68-7	2,4-dinitrotoluene	121-14-2
Benzo(a)anthracene	56-55-3	2,6-dinitrotoluene	606-20-2
Benzo(b)fluoranthene (3,4-benzofluoranthene)	205-99-2	Di-n-octyl phthalate	117-84-0
Benzo(j)fluoranthene	205-82-3	1,2-Diphenylhydrazine (as <i>Azobenzene</i>)	122-66-7
Benzo(k)fluoranthene (11,12-benzofluoranthene)	207-08-9	Fluoranthene	206-44-0
Benzo(r,s,t)pentaphene	189-55-9	Fluorene	86-73-7
Benzo(a)pyrene	50-32-8	Hexachlorobenzene	118-74-1
Benzo(ghi)Perylene	191-24-2	Hexachlorobutadiene	87-68-3
Bis(2-chloroethoxy)methane	111-91-1	Hexachlorocyclopentadiene	77-47-4
Bis(2-chloroethyl)ether	111-44-4	Hexachloroethane	67-72-1
Bis(2-chloroisopropyl)ether	39638-32-9	Indeno(1,2,3-cd)Pyrene	193-39-5
Bis(2-ethylhexyl)phthalate	117-81-7	Isophorone	78-59-1
4-Bromophenyl phenyl ether	101-55-3	3-Methyl cholanthrene	56-49-5
2-Chloronaphthalene	91-58-7	Naphthalene	91-20-3
4-Chlorophenyl phenyl ether	7005-72-3	Nitrobenzene	98-95-3
Chrysene	218-01-9	N-Nitrosodimethylamine	62-75-9
Dibenzo (a,j)acridine	224-42-0	N-Nitrosodi-n-propylamine	621-64-7
Dibenzo (a,h)acridine	226-36-8	N-Nitrosodiphenylamine	86-30-6
Dibenzo(a-h)anthracene (1,2,5,6-dibenzanthracene)	53-70-3	Perylene	198-55-0
Dibenzo(a,e)pyrene	192-65-4	Phenanthrene	85-01-8
Dibenzo(a,h)pyrene	189-64-0	Pyrene	129-00-0
		1,2,4-Trichlorobenzene	120-82-1

7. Are any other pesticides, herbicides or fungicides used at this facility? ☒ YES ☐ NO

If yes, specify the material and quantity used:

See attachment E.7.

8. Are there other pollutants that you know of or believe to be present? ☒ YES ☐ NO

If yes, specify the pollutants and their concentration if known
(attach laboratory analyses if available as Attachment E8):

See Attachment E.8

9. Is the wastewater being discharged, or proposed for discharge, to the POTW designated as a dangerous waste according to the procedures in Chapter 173-303 WAC?

☐ YES ☒ NO ☐ DON'T KNOW

10. If the answer to question 9 above is yes, how did the waste designate as a dangerous waste (check appropriate box)?

For Listed and TCLP Characteristic Wastes only, also provide the Dangerous Waste Number(s).

Listed Waste ☐ Dangerous Waste Number(s) _____

Characteristic Wastes Dangerous Waste Number(s) _____

Ignitable ☐

Reactive ☐

Corrosive ☐

TCLP ☐

State Only Dangerous Wastes Dangerous Waste Number(s) _____

Toxicity ☐

Persistent ☐

For questions about waste designation under the *Dangerous Waste Regulations*, Chapter 173-303 WAC, contact Ecology's Hazardous Waste and Toxics Program at:

Northwest Regional Office - Bellevue	(425) 649-7000
Southwest Regional Office - Lacey	(360) 407-6300
Central Regional Office - Yakima	(509) 575-2490
Eastern Regional Office - Spokane	(509) 329-3400

SECTION F. SEWER INFORMATION

1. Is an inspection and sampling manhole or similar structure available on-site? ☒ YES ☐ NO
*If yes, attach a map or hand drawing of the facility that shows the location of these structures
(Label as attachment F1 or this may be combined with map in H8, if H8 is applicable to your
facility.)*

SECTION G. OTHER PERMITS

1. List all environmental control permits or approvals needed for this facility; for example, air emission permits.

Ascensus Specialties facility at Elma has withdrawn from Title V and therefore air permit #11AOP850 has been rescinded. See letter from ORCAA in the attachments.

SECTION H. STORMWATER

1. Do you have coverage under the Washington State Industrial Stormwater NPDES General Permit? ☐ YES ☒ NO

If yes, please list the permit number here. _____

- If no, have you applied for a Washington State Stormwater Industrial Stormwater General Permit? ☐ YES ☒ NO

If you answered no to both questions above, complete the following questions 2 through 5.

2. Does your facility discharge stormwater: *(Check all that apply)*

- ☐ To storm sewer system *(provide name of storm sewer system operator: _____)*
☐ Directly to any surface waters of Washington State (e.g., river, lake, creek, estuary, ocean).

Specify waterbody name(s) _____

- ☐ Indirectly to surface waters of Washington State *(i.e., flows over adjacent properties first)*.
☐ To a Sanitary Sewer
☐ Directly to ground waters of Washington State via:
☐ Dry well
☐ Drainfield
☐ Other

3. Areas with industrial activities at facility: *(check all that apply)*

- ☒ Manufacturing Building
☒ Material Handling
☒ Material Storage
☐ Hazardous Waste Treatment, Storage, or Disposal *(Refers to RCRA, Subtitle C Facilities Only)*
☐ Waste Treatment, Storage, or Disposal
☐ Application or Disposal of Wastewaters
☐ Storage and Maintenance of Material Handling Equipment
☐ Vehicle Maintenance
☐ Areas Where Significant Materials Remain
☒ Access Roads and Rail Lines for Shipping and Receiving
☐ Other (please specify): _____

4. Material handling/management practices

a. Types of materials handled and/or stored outdoors: *(check all that apply)*

- | | |
|--|---|
| <input type="checkbox"/> Solvents | <input checked="" type="checkbox"/> Hazardous Wastes |
| <input type="checkbox"/> Scrap Metal | <input checked="" type="checkbox"/> Acids or Alkalies |
| <input type="checkbox"/> Petroleum or Petrochemical Products | <input type="checkbox"/> Paints/Coatings |
| <input type="checkbox"/> Plating Products | <input type="checkbox"/> Woodtreating Products |
| <input type="checkbox"/> Pesticides | <input type="checkbox"/> Other <i>(please list)</i> : _____ |

b. Identify existing management practices employed to reduce pollutants in industrial stormwater discharges: *(check all that apply)*

- | | |
|---|---|
| <input checked="" type="checkbox"/> Oil/Water Separator | <input checked="" type="checkbox"/> Detention Facilities |
| <input checked="" type="checkbox"/> Containment | <input type="checkbox"/> Infiltration Basins |
| <input checked="" type="checkbox"/> Spill Prevention | <input type="checkbox"/> Operational BMPs |
| <input type="checkbox"/> Surface Leachate Collection | <input type="checkbox"/> Vegetation Management |
| <input type="checkbox"/> Overhead Coverage | <input type="checkbox"/> Other <i>(please list)</i> : _____ |

5. Attach a facility site map showing stormwater drainage/collection areas, disposal areas and discharge points. This may be a hand-drawn map if no other site map is available *(See example on page 16 of this application)*. Label this as attachment H.5.

SECTION I. OTHER INFORMATION

1. Describe liquid wastes or sludges being generated by your facility that are not disposed of in the waste stream(s) and how they are being disposed of. For each type of waste, provide type of waste and the name, address, and phone number of the hauler.

Spent acetone from QC laboratory, spent fuels, managed by Clean Harbors

Used oil alternate fuels to PRS Tacoma, managed by Safety Clean

Waste sodium , incineration, managed by Stericycle and Clean Harbors

Lithium Chloride/methanol solution, managed by Clean Harbors

Centrifuge solids, stabilization, managed by Clean Harbors

Clean Harbors 26328 79th Ave S Kent WA 98032 253-638-3550

SafetyKleen intermediate facility 3102 B St NW Auburn WA 98001 25-561-8270

Stericycle Environmental Solutions 18000 72nd Ave S Suite 217 Kent WA 98032 425-204-7043

2. Describe storage areas for raw materials, products, and wastes.

Liquid raw materials and products are stored in storage tanks outside. All storage tanks for raw materials and products are within secondary containment structures. Dry raw materials and products are stored within buildings. No raw materials or products are stored in a manner which would produce discharge directly to the POTW. Solid wastes are stored in covered dumpsters for disposal to the municipal landfill. Hazardous wastes are stored in enclosed buildings or containers. All hazardous waste storage areas meet secondary containment requirements.

3. Have you designated the wastes described above according to the applicable ☒ YES ☐ NO procedures of Dangerous Waste Regulations, Chapter 173-303 WAC?

SECTION J. CERTIFICATIONS

1. Approval by Publicly-Owned Treatment Works [required by WAC 173-216-070(4)(b)]

I approve of the discharge as described in this application. The applicant is:

(Please check the appropriate box below.)

☐ ☐ ☐ A Significant Industrial User (see Definitions at the end of this Section)

☒ ☐ ☐ A Categorical Industrial User

☐ ☐ ☐ Neither of the above

Name and location of sewer system to which this project will be tributary:

Treatment Works Owner: City of Elma

Street: PO Box 3005

City/State: Elma, WA

Zip: 98541


Signature of Treatment Works Authority

10-26-2020
Date

Director of Public Works
Title

Jim Starks

Printed Name

2. Application review by Intermediate Sewer Owner at point of discharge (if applicable)

I hereby acknowledge that I have reviewed the application for discharge to this sewer system.

Name and location of sewer system to which this project will be tributary:

Sewer System Owner: _____

Street: _____

City/State: _____

Zip: _____

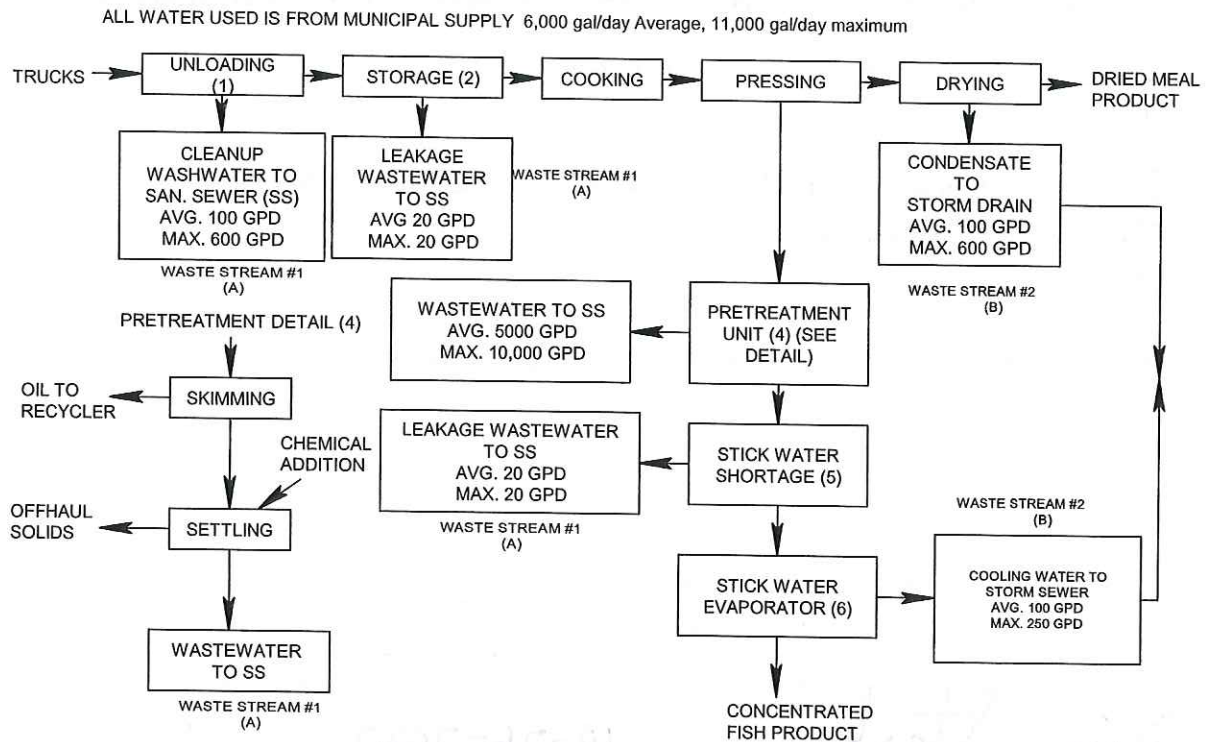
Signature of Sewer System Authority

Date

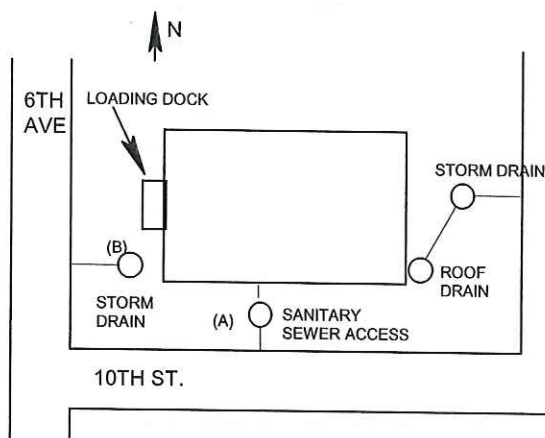
Title

Printed Name

Example 1 for application section C.2. (SCHEMATIC DIAGRAM)



Example 2 for application section F1 or H8 (FACILITY SITE MAP)



DEFINITIONS

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.

Control Authority - means the Washington State Department of Ecology in the case of non-delegated POTWs or means the POTW in the case of delegated POTWs.

Categoric Industrial User (CIU): An industrial user subject to national categorical pretreatment standards promulgated by EPA (40 CFR 403.6 and 40 CFR parts 405-471).

Summary of Attachments That May be Required for This Application:

(Please check those attachments that are included)

- | | | | |
|-------------------------------------|--------------------------|------|---|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | C.2. | Production schematic flow diagram and water balance |
| <input type="checkbox"/> | <input type="checkbox"/> | C.4. | Wastewater treatment improvements |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | C.7. | Additional incidental materials |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | E.8. | Additional results of effluent testing |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | F.1. | Facility site map |
| <input type="checkbox"/> | <input type="checkbox"/> | H.5. | Stormwater drainage map |

If you need this document in a format for the visually impaired, call the Water Quality Program at 360-407-6600. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

Attachment B.1.a Raw Materials and Products

Raw Materials		
<u>Type</u>	<u>Quantity</u>	<u>Method of Storage</u>
Boric Acid	*	Silos
Methanol	*	Pressure rated tanks, outside
Sodium	*	Pressure rated tanks in sodium hydride building, railcars
Natural Gas	*	No storage on site
Lithium Chloride	*	Warehouse storage, Pressure vessels in solution in process
Mineral Oil	*	Pressure rated tanks, atmospheric tank
Water (city water)	*	No storage on site
Isopropyl Amine	*	Pressure rated tank
Silicon Dioxide (Fumed silica)	*	Warehouse storage
Magnesium Carbonate	*	Warehouse storage
Potassium Hydroxide	*	Atmospheric storage tank

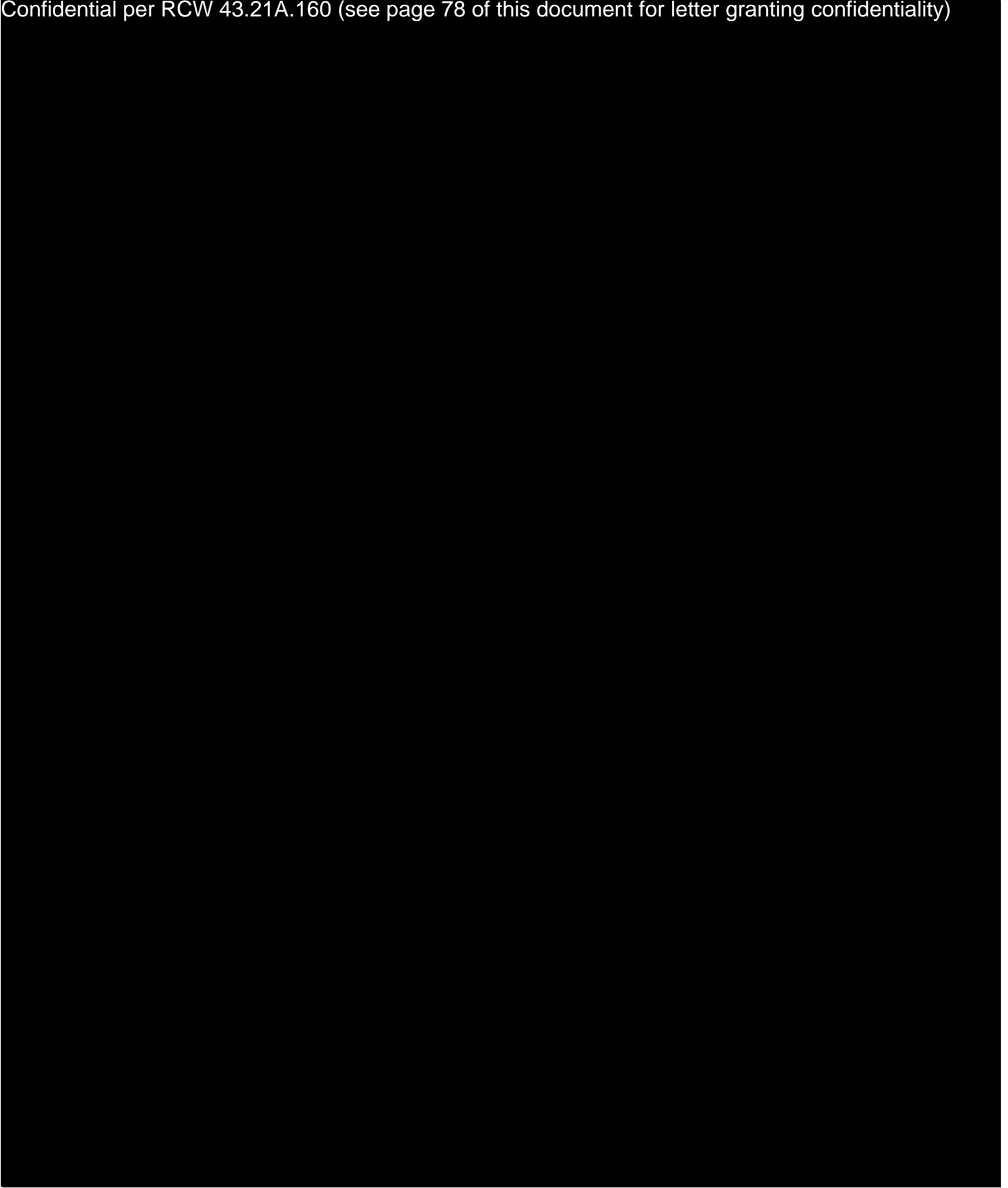
Products		
<u>Type</u>	<u>Quantity</u>	<u>Method of Storage</u>
TMB - Azeo	*	Packaged on demand
TMB	*	Packaged on demand. Drum storage on concrete curbed containment pad.
Sodium Borohydride Solution (SBH)	*	Atmospheric tanks
Sodium Borohydride (DSBH)	*	Warehouse storage
Potassium Borohydride (KBH)	*	Warehouse storage

*Quantities of Raw Materials and Products are market sensitive and confidential.
Quantities are attached as confidential attachment.

Attachment B.1 Raw Materials and Products

Confidential

Confidential per RCW 43.21A.160 (see page 78 of this document for letter granting confidentiality)




Attachment C.1 Operational Characteristics

Process	Waste Stream Name	Waste Stream ID#	Batch or Continuous Process
DSBH	Vacuum Condensate	1	Batch (Neutralized in effluent, discharge to POTW)
Utility	Boiler Blowdown	2	Batch (Neutralized in effluent, discharge to POTW)
Utility	Cooling Tower Blowdown	3	Continuous (Used for process feedwater)
Utility	Softened Water Blowdown	4	Batch (Discharge to POTW via sanitary sewer)
Quality Control Laboratory Operations	Lab Water	5	Batch (Discharge to POTW via sanitary sewer)
SBH	Equipment Washdowns	6	Batch (Neutralized and discharged to POTW)
DSBH	Equipment Washdowns	7	Batch (Neutralized and discharged to POTW)
KBH	Equipment Washdowns	8	Batch (Neutralized and discharged to POTW)
SBH	G9T SBH Centrifuge Backflush (centrifuge is used to extract oil from the process)	9	Batch (Neutralized and discharged to POTW)

Attachment C.2 Overall Facility Water Balance

Confidential

Confidential per RCW 43.21A.160 (see page 78 of this document for letter granting confidentiality)



Attachment C.2.a LSBH Process Block Diagram
Confidential

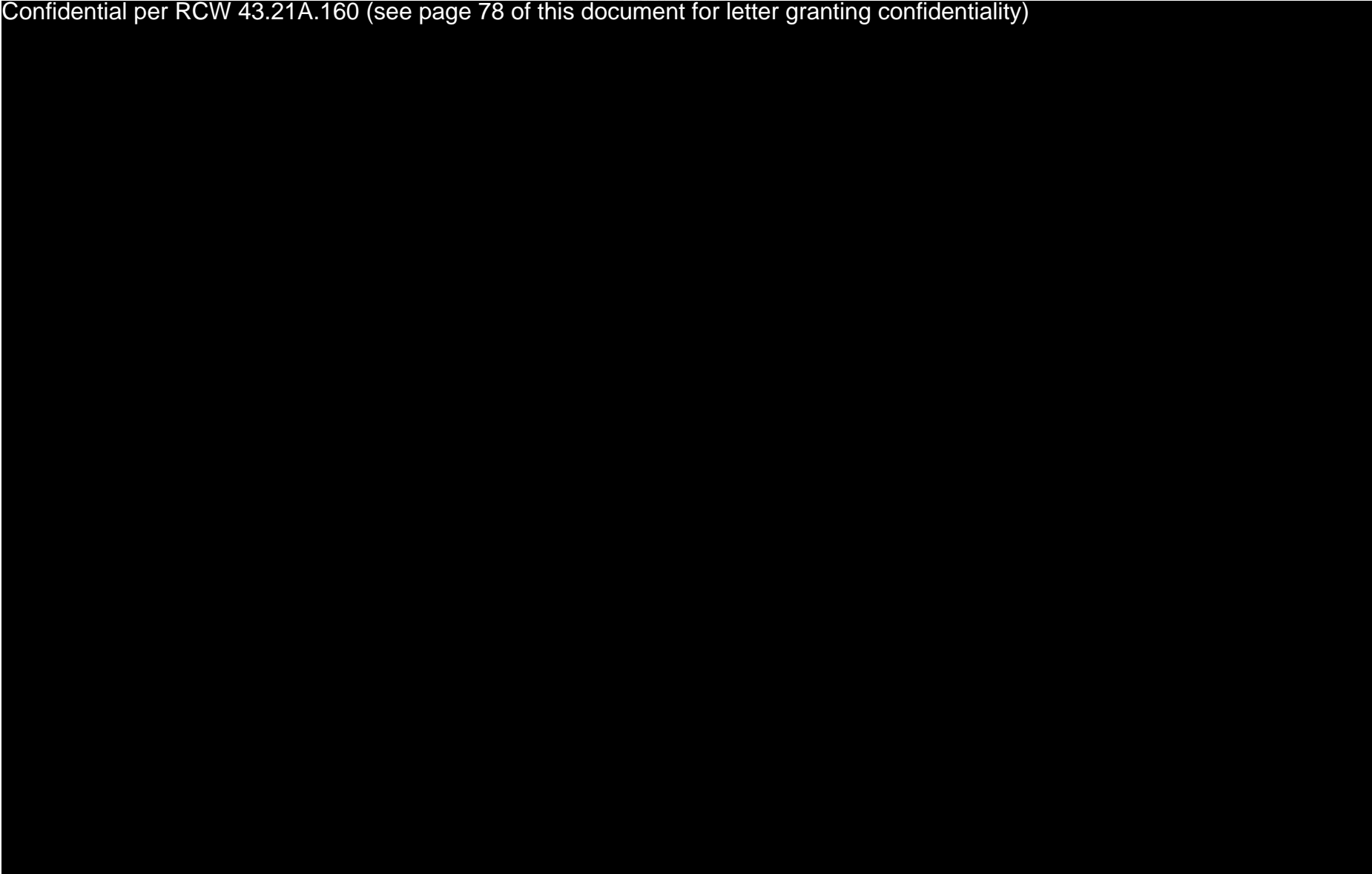
Confidential per RCW 43.21A.160 (see page 78 of this document for letter granting confidentiality)



Attachment C.2.b DSBH Process Block Diagram

Confidential

Confidential per RCW 43.21A.160 (see page 78 of this document for letter granting confidentiality)



Attachment C.7 Incidental Materials

Production	Quantity	Units
Diesel Oil	5,400	gal (avg)
Dessicant-Air Dryers	200	lbs
Safe-t-Phos (Phos. Acid, 42%)	165	gal
Hydrogen Catalyst (C-12-4-02), (G-3), (G-90)	440	gal
Sulfuric Acid	900	gal (avg)
Rock Salt- ice control	1	ton
Sodium Chloride- water softener	1200	lbs
Ethylene Glycol	6000	gal
Fire Fighting		
ABC Dry Chemical	700	lbs
BC Dry Chemical	1960	lbs
Class D Powder (sodium fire suppression)	210	lbs
Potassium Bicarbonate Dry Chemical	260	lbs
Carbon Dioxide Gas (extinguisher)	170	lbs
Halotron Liquified Gas (extinguisher)	10	lbs
QC Lab		
Acetone	110	gal
Utilities		
Boiler Feed Chemicals		
Diethylamino Ethanol CH2O #6394	150	gal
Sodium sulfite CH2O # 6014	350	lbs
Posca boiler treatment, CH2O #6658U	75	gal
Posca with sulfite, CH2O #6267A	200	gal
Cooling Tower Chemicals		
Posca Corrosion inhibitor, CH2O #6319	325	gal
Unibrom Plus Biocide	110	gal
Dispersant/Penetrant Surfactant, CH2O #6143	20	gal
DSBH Corrosion Inhibitor, CH2O #6439	10	gal
Effluent Chemicals		
Foamchek 707	40	gal
Sodium bicarbonate	1000	lbs
Maintenance		
Gasoline	5	gal
Nuto H46 Hydraulic oil	75	gal
SCH 626 Bearing/gear oil	35	gal
SCH 629 Bearing/gear oil	30	gal
SCH 630 Bearing/gear oil	30	gal
SCH 632 Bearing/gear oil	30	gal
SCH 634 Bearing/gear oil	30	gal
Rarus 427 oil	20	gal
Bar and Chain oil	10	gal
AW32 hydraulic fluid	20	gal
MobileGear 600 XP oil	50	gal
Delvac 1630	30	gal
Delvac 1640	30	gal
80w90 oil	20	gal
Multivehicle ATF	10	gal

Attachment E.7 Pesticide, Herbicide, Fungicide Use

Manufacturer	Product Name	Quantity Used
Liphatech Inc.	Maki Mini Blocks	Variable
Univar	MasterLine Bifenthrin 7.9 Termiticide/Insecticide	Variable
Syngenta Crop Protection LLC	Arilon	Variable
Pro-serve	BareSpot Monobar-Chlorate	Variable
OHP, Inc	Casoron 4G	Variable
Lilly Miller	MossOut Lawn Granules	Variable
Ragan and Masse, Inc	RM43 43% Glyphosate Plus Wee Preventer Total Vegetation Control	Variable
PBI/Gordon Corp	Gordon's Barrier Ornamental Landscaping Herbicide	Variable
Voluntary Purchasing Group, Inc	Hi-Yield Super Concentrate Killzall Weed and Grass Killer	Variable

**Attachment E.8 Additional Parameter Measurements from Lift Station
Effluent**

Date	Boron (mg/L)	Methanol (ppm)	Isopropylamine (ppm)
9/1/2019	185.6	104	3
9/2/2019	58.22	2	4
9/3/2019	54.45	0	2
9/4/2019	37.88	0	1
9/5/2019	82.03	25	2
9/6/2019	98.23	26	3
9/7/2019	66	0	4
9/8/2019	35.98	0	0
9/9/2019	60.14	3	0
9/10/2019	44.9	0	1
9/11/2019	52.18	141	0
9/12/2019	111.02	405	0
9/13/2019	96.26	104	0
9/14/2019	110.26	70	0
9/15/2019	43.21	48	3
9/16/2019	82.98	53	2
9/17/2019	46.13	237	2
9/18/2019	50.34	168	1
9/19/2019	44.31	330	2
9/20/2019	105.43	154	0
9/21/2019	132.56	214	1
9/22/2019	134.56	149	1
9/23/2019	108.1	104	6
9/24/2019	66.72	176	1
9/25/2019	100.82	102	2
9/26/2019	82.89	91	4
9/27/2019	67.99	33	0
9/28/2019	69.14	56	0
9/29/2019	29.47	5	2
9/30/2019	22.14	3	2
10/1/2019	48.77	4	1
10/2/2019	63.41	37	2
10/3/2019	140.16	110	0
10/4/2019	163.21	144	0
10/5/2019	86.27	2	0
10/6/2019	58.63	1	0
10/7/2019	38.84	0	0
10/8/2019	33.55	0	0
10/9/2019	49.08	1	0
10/10/2019	55.07	6	0
10/11/2019	19.23	0	0

10/12/2019	81.44	13	0
10/13/2019	88.34	24	1
10/14/2019	98.42	7	0
10/15/2019	129.25	8	0
10/16/2019	111.16	1	0
10/17/2019	114.83	10	0
10/18/2019	94.04	4	0
10/19/2019	79.73	13	0
10/20/2019	69.88	6	0
10/21/2019	143.36	11	0
10/22/2019	181.93	13	0
10/23/2019	48.15	2	0
10/24/2019	73.52	9	0
10/25/2019	86.98	8	0
10/26/2019	232.45	54	1
10/27/2019	176.05	23	0
10/28/2019	136.18	14	0
10/29/2019	132.16	18	0
10/30/2019	119.51	32	0
10/31/2019	73.26	4	0
11/1/2019	81.62	15	0
11/2/2019	46.64	16	0
11/3/2019	37.04	20	0
11/4/2019	71.39	41	0
11/5/2019	84.4	50	0
11/6/2019	132.92	49	0
11/7/2019	49.7	9	0
11/8/2019	38.69	9	0
11/9/2019	77.23	12	0
11/10/2019	82.75	18	0
11/11/2019	96.49	14	0
11/12/2019	48.46	4	0
11/13/2019	50.48	29	0
11/14/2019	102.8	11	0
11/15/2019	33.7	12	0
11/16/2019	53.8	7	0
11/17/2019	50.75	11	0
11/18/2019	141.52	4	0
11/19/2019	63.2	3	0
11/20/2019	7.11	2	0
11/21/2019	26.48	2	0
11/22/2019	22.32	1	0
11/23/2019	48.42	0	0
11/24/2019	53.87	1	0
11/25/2019	79.1	3	0
11/26/2019	128.34	27	0
11/27/2019	70.06	28	0

11/28/2019	35.48	18	0
11/29/2019	9.13	0	0
11/30/2019	36.11	70	0
12/1/2019	149.42	32	0
12/2/2019	206.85	16	1
12/3/2019	193.46	0	0
12/4/2019	130.11	23	0
12/5/2019	29.89	16	0
12/6/2019	84.72	4	1
12/7/2019	65.46	21	0
12/8/2019	40.48	10	0
12/9/2019	58.89	10	0
12/10/2019	84.6	20	0
12/11/2019	71.9	6	0
12/12/2019	215.02	12	0
12/13/2019	108.4	0	0
12/14/2019	63.45	10	0
12/15/2019	64.54	14	0
12/16/2019	76.77	10	0
12/17/2019	73.04	8	0
12/18/2019	53.13	2	0
12/19/2019	48.53	1	0
12/20/2019	71.8	8	0
12/21/2019	89.45	2	0
12/22/2019	64.34	3	0
12/23/2019	62.08	3	0
12/24/2019	72.14	2	0
12/25/2019	64.41	0	0
12/26/2019	55.86	1	0
12/27/2019	31.48	4	0
12/28/2019	63.94	26	0
12/29/2019	49.73	10	0
12/30/2019	42.69	4	0
12/31/2019	32.77	3	0
1/1/2020	43.25	1	0
1/2/2020	63.55	1	0
1/3/2020	67.14	1	0
1/4/2020	14.46	1	0
1/5/2020	11.89	0	0
1/6/2020	21.41	0	0
1/7/2020	11.8	1	0
1/8/2020	24.42	2	0
1/9/2020	28.32	2	0
1/10/2020	50.69	2	0
1/11/2020	39.92	0	0
1/12/2020	22.06	1	0
1/13/2020	25.32	0	0

1/14/2020	42.58	0	0
1/15/2020	50.38	1	1
1/16/2020	74.45	0	1
1/17/2020	35.11	1	0
1/18/2020	82.49	4	0
1/19/2020	70.4	4	0
1/20/2020	57.71	1	0
1/21/2020	78.96	0	0
1/22/2020	80.7	0	0
1/23/2020	58.37	0	0
1/24/2020	22.02	0	0
1/25/2020	30.83	0	0
1/26/2020	20.73	0	0
1/27/2020	28.62	0	0
1/28/2020	22.28	0	0
1/29/2020	19.52	0	0
1/30/2020	17.61	3	1
1/31/2020	19.97	0	0
2/1/2020	47.65	1	0
2/2/2020	53.67	1	0
2/3/2020	29.55	1	0
2/4/2020	31.72	0	0
2/5/2020	25.76	1	0
2/6/2020	53.11	19	1
2/7/2020	86.24	21	0
2/8/2020	30.53	0	0
2/9/2020	34.52	0	0
2/10/2020	58.88	1	0
2/11/2020	153.92	2	0
2/12/2020	22.24	1	0
2/13/2020	190.5	11	0
2/14/2020	88.25	4	0
2/15/2020	46.41	1	0
2/16/2020	48.33	0	0
2/17/2020	95.55	9	0
2/18/2020	80.96	22	0
2/19/2020	6.05	0	0
2/20/2020	22.27	2	0
2/21/2020	68.73	0	0
2/22/2020	40.28	0	0
2/23/2020	43.54	4	0
2/24/2020	52.61	0	0
2/25/2020	94.12	1	0
2/26/2020	69.3	2	0
2/27/2020	37.04	3	0
2/28/2020	37.77	0	0
2/29/2020	57.64	4	0

3/1/2020	77.77	4	0
3/2/2020	51.27	3	0
3/3/2020	31.85	2	0
3/4/2020	172.19	18	0
3/5/2020	293.2	33	0
3/6/2020	114.35	5	0
3/7/2020	107.33	1	0
3/8/2020	54.08	0	0
3/9/2020	82.3	0	0
3/10/2020	49.54	0	0
3/11/2020	95.07	0	0
3/12/2020	87.06	0	0
3/13/2020	51.65	0	0
3/14/2020	31.03	6	0
3/15/2020	39.07	2	0
3/16/2020	36.62	1	0
3/17/2020	54.89	0	0
3/18/2020	30.17	0	0
3/19/2020	53.42	3	2
3/20/2020	196.25	22	1
3/21/2020	52.41	6	0
3/22/2020	109.4	0	0
3/23/2020	47.16	0	0
3/24/2020	35.73	0	0
3/25/2020	11.71	1	0
3/26/2020	10.94	2	0
3/27/2020	18.73	0	0
3/28/2020	40.54	2	0
3/29/2020	30.39	0	0
3/30/2020	34.91	0	0
3/31/2020	30.92	0	0
4/1/2020	46.56	0	0
4/2/2020	31.53	0	0
4/3/2020	30.54	0	0
4/4/2020	21.8	0	0
4/5/2020	33.92	0	1
4/6/2020	89.99	12	0
4/7/2020	105.19	37	0
4/8/2020	110.57	51	0
4/9/2020	47.16	9	0
4/10/2020	35.22	7	0
4/11/2020	44.12	20	0
4/12/2020	54.61	12	0
4/13/2020	51.58	0	0
4/14/2020	35.65	0	0
4/15/2020	36.14	0	0
4/16/2020	46.28	0	0

4/17/2020	60.45	0	0
4/18/2020	51.68	2	0
4/19/2020	52.89	9	0
4/20/2020	36.79	4	0
4/21/2020	120.74	2	0
4/22/2020	186.05	0	0
4/23/2020	83.16	0	0
4/24/2020	27.45	0	0
4/25/2020	14.1	0	0
4/26/2020	30.54	0	0
4/27/2020	11.98	0	0
4/28/2020	20.11	0	0
4/29/2020	100.62	0	0
4/30/2020	38.26	0	0
5/1/2020	17.25	0	0
5/2/2020	37.7	2	0
5/3/2020	18.86	0	0
5/4/2020	18.01	0	1
5/5/2020	78.31	1	0
5/6/2020	64.63	1	0
5/7/2020	93.97	1	0
5/8/2020	33.38	0	0
5/9/2020	24.6	3	0
5/10/2020	52.94	0	1
5/11/2020	47.81	1	1
5/12/2020	78.66	6	0
5/13/2020	92.59	30	0
5/14/2020	25.16	11	0
5/15/2020	108.22	3	0
5/16/2020	52.17	0	0
5/17/2020	51.85	1	0
5/18/2020	61.24	6	0
5/19/2020	203.98	6	0
5/20/2020	559.21	0	0
5/21/2020	286	4	0
5/22/2020	86.02	1	0
5/23/2020	108.57	5	0
5/24/2020	30.85	2	0
5/25/2020	65.52	6	0
5/26/2020	46.55	3	0
5/27/2020	166.53	5	0
5/28/2020	353.26	4	0
5/29/2020	91.18	2	0
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5/31/2020	43.41	0	0
6/1/2020	54.35	0	0
6/2/2020	45.82	7	0

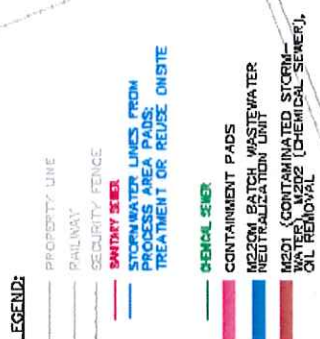
6/3/2020	42.05	6	0
6/4/2020	28.42	0	0
6/5/2020	17.68	0	0
6/6/2020	28.23	1	0
6/7/2020	51.98	9	0
6/8/2020	84.86	12	0
6/9/2020	142.21	10	0
6/10/2020	77.11	13	0
6/11/2020	102.32	6	0
6/12/2020	133.37	10	0
6/13/2020	77.64	0	1
6/14/2020	62.53	0	0
6/15/2020	29.49	0	0
6/16/2020	94.04	5	0
6/17/2020	87.79	5	0
6/18/2020	60.82	2	0
6/19/2020	56.43	1	0
6/20/2020	40.04	2	0
6/21/2020	28.95	4	0
6/22/2020	51.3	0	0
6/23/2020	58.33	0	0
6/24/2020	21.97	0	0
6/25/2020	87.97	16	0
6/26/2020	65.52	2	0
6/27/2020	27	0	0
6/28/2020	20.74	0	0
6/29/2020	32.53	0	0
6/30/2020	32.1	0	0
7/1/2020	38.84	0	0
7/2/2020	36.48	1	0
7/3/2020	54.55	1	6
7/4/2020	43.49	0	4
7/5/2020	23.65	0	4
7/6/2020	43.77	0	20
7/7/2020	66.63	0	6
7/8/2020	48.49	0	3
7/9/2020	61.48	0	3
7/10/2020	43.43	0	3
7/11/2020	22.28	0	3
7/12/2020	3.3	0	0
7/13/2020	166.6	0	3
7/14/2020	429.67	332	22
7/15/2020	351.55	310	5
7/16/2020	104.43	124	0
7/17/2020	55.86	11	0
7/18/2020	12.61	3	0
7/19/2020	48.16	27	0

7/20/2020	299.88	3	0
7/21/2020	59.41	0	0
7/22/2020	148.25	0	4
7/23/2020	43.68	0	1
7/24/2020	43.14	20	10
7/25/2020	50.02	41	38
7/26/2020	102.42	110	19
7/27/2020	107.43	129	13
7/28/2020	58.54	161	4
7/29/2020	47.29	27	4
7/30/2020	206.22	3	6
7/31/2020	408.63	1	19
8/1/2020	561.88	50	50
8/2/2020	188.14	3	21
8/3/2020	122.22	24	19
8/4/2020	166.52	2	21
8/5/2020	72.16	0	30
8/6/2020	39.71	0	13
8/7/2020	36.03	0	4
8/8/2020	30.46	0	3
8/9/2020	56.63	0	7
8/10/2020	45.75	0	8
8/11/2020	55.97	0	7
8/12/2020	42.05	0	9
8/13/2020	52.51	3	11
8/14/2020	58.78	11	20
8/15/2020	51.59	9	10
8/16/2020	38.67	3	14
8/17/2020	5.15	0	16
8/18/2020	31.42	0	9
8/19/2020	71.08	0	13
8/20/2020	81.23	151	9
8/21/2020	40.47	39	7
8/22/2020	25.29	0	3
8/23/2020	75.97	156	7
8/24/2020	68.96	97	14
8/25/2020	46.49	28	13
8/26/2020	42.52	35	32
8/27/2020	42.2	19	14
8/28/2020	51.82	24	15
8/29/2020	27.87	12	4
8/30/2020	30.49	7	9
8/31/2020	38.25	2	6
9/1/2020	33	3	4
9/2/2020	28.33	19	12
9/3/2020	31.37	19	16
9/4/2020	40.57	14	13

9/5/2020	25.86	5	0
9/6/2020	36.94	3	0
9/7/2020	59.2	5	0
9/8/2020	25.61	3	1
9/9/2020	5.9	0	2
9/10/2020	43.67	34	37
9/11/2020	53.35	139	22
9/12/2020	36.07	37	4
9/13/2020	37.55	0	0
9/14/2020	69.55	0	0
9/15/2020	40.33	2	0
9/16/2020	38.16	0	0
9/17/2020	43.61	0	0
9/18/2020	64.66	92	7
9/19/2020	78.78	379	13
9/20/2020	67.77	36	14
9/21/2020	48.03	129	0
9/22/2020	67.63	129	11
9/23/2020	50.18	10	17
9/24/2020	116.69	3	24
9/25/2020	92.68	7	26
9/26/2020	41.52	6	1
9/27/2020	14.52	6	10
9/28/2020	3.27	2	0
9/29/2020	11.69	2	0
9/30/2020	52.19	26	51

Average	70.96	19.86	2.45
Min	3.27	0.00	0.00
Max	561.88	405.00	51.00

ANALYSIS

[illegible]



2940 Limited Lane NW

Olympia, WA 98502

*Representing Clallam, Grays Harbor, Jefferson,
Mason, Pacific, and Thurston Counties*

(360) 539-7610 • 1-800-422-5623

September 14, 2020

Randall Reed, Site Director
Ascensus Specialties LLC
4800 State Route 12
Elma, WA 98541

RE: Air Operating Permit Program Withdrawal Request

Dear Mr. Reed,

Olympic Region Clean Air Agency (ORCAA) approves Ascensus Specialties LLC's (Ascensus) request to withdraw from ORCAA's Air Operating Permit program. On September 14, 2020, ORCAA issued Order of Approval for Notice of Construction (NOC) # 19NOC1411 that established a voluntary limit on emissions of methanol in order to characterize the facility as an area source with respect to all Maximum Achievable Control Technology (MACT) standards in 40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants (NESHAPs) and a minor source with respect to the Air Operating Permit (AOP) program.

Withdrawal from the AOP program establishes Ascensus as a registered source under ORCAA Rule 4.1. In addition to complying with the requirements of Order of Approval for NOC# 19NOC1411, Ascensus is also required to comply with applicable state, federal and local performance standards for air emissions including emission standards adopted under chapter 70A.15 of the Revised Code of Washington (RCW), emissions standards of ORCAA, and federal emission standards including new source performance standards (NSPS), national emission standards for hazardous air pollutants (NESHAP), national emission standards for hazardous air pollutants for source categories (MACT standards). A comprehensive list of applicable regulations and standards are listed in Table 5 of NOC# 19NOC1411.

ORCAA hereby rescinds Ascensus Specialties LLC's current Air Operating Permit# 11AOP850 as of September 14, 2020.

Please submit the following final AOP reports to ORCAA no later than October 14, 2020:

1. Semi-annual monitoring report for period for July 1, 2010 – September 13, 2020.
2. Annual compliance certification for period January 1, 2020 – September 13, 2020.

Please contact Jennifer DeMay at jennifer.demay@orcaa.org if you have any questions.

Sincerely,

Francea L. McNair
Executive Director

Cc (via email): Dion Baratti - Ascensus
Jennifer DeMay, Mark Goodin, Robert Moody, Mike Shults – ORCAA
Doug Hardesty, EPA Region 10



Issuance Date: April 21, 2017
Effective Date: June 1, 2017
Expiration Date: May 31, 2022

STATE WASTE DISCHARGE PERMIT NUMBER ST 5037

State of Washington
DEPARTMENT OF ECOLOGY
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

In compliance with the provisions of the
State of Washington Water Pollution Control Law
Chapter 90.48 Revised Code of Washington, as amended,

Vertellus Performance Chemicals LLC
4800 State Route 12
Elma Washington 98541

is authorized to discharge wastewater in accordance with the special and general conditions which follow.

Facility Location: 4800 State Route 12 Elma, WA 98541	SIC Code: 2819 & 2869 NAICS Code: 325188 & 325199
Industry Type: Inorganic chemical manufacturing POTW Receiving Discharge: Elma City	Significant Industrial User

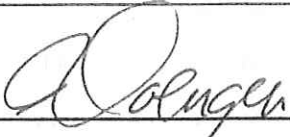

Richard Doenges
Southwest Region Manager
Water Quality Program
Washington State Department of Ecology

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SUMMARY OF PERMIT REPORT SUBMITTALS

Refer to the Special and General Conditions of this permit for additional submittal requirements.

Permit Section	Submittal	Frequency	First Submittal Date
S3.A.	Discharge Monitoring Report (DMR)	Monthly	July 15, 2017
S3.A.	Permit Renewal Application Monitoring Data	1/permit cycle	November 1, 2020
S3.A.	DMR - Priority Pollutant Data - Single Sample Data	2/permit cycle	July 15, 2018 & October 15, 2020
S3.F.	Reporting Permit Violations	As necessary	
S4.A.	Operation and Maintenance Manual	1/permit cycle	January 2, 2018
S4.B.	Reporting Bypasses	As necessary	
S8.	Application for Permit Renewal	1/permit cycle	November 1, 2020
S10.	Spill Plan	1/permit cycle	July 15, 2019
S11.	Slug Discharge Control Plan	1/permit cycle	July 15, 2019
G1.	Notice of Change in Authorization	As necessary	
G4.	Permit Application for Substantive Changes to the Discharge	As necessary	
G5.	Engineering Report for Construction or Modification Activities	As necessary	
G7.	Notice of Permit Transfer	As necessary	
G10.	Duty to Provide Information	As necessary	

SPECIAL CONDITIONS

S1. DISCHARGE LIMITS

All discharges and activities authorized by this permit must comply with the terms and conditions of this permit. The discharge of any of the following pollutants more frequently than, or at a concentration in excess of, that authorized by this permit violates the terms and conditions of this permit.

A discharge of a pollutant in excess of local limits set by the City of Elma violates the terms and conditions of this permit.

Beginning on the effective date, the Permittee is authorized to discharge treated wastewater (vacuum condensate, boiler blowdown, cooling tower blowdown, softened water blowdown, lab water, equipment wash-down and SBH centrifuge backflush) to the city of Elma's sewer system subject to the following limits:

.Effluent Limits: Outfall 001 Latitude: 46.99463 Longitude: -123.38368		
Parameter	Average Monthly ^a	Maximum Daily ^b
Flow, Gallons Per Day (GPD)	60,000	80,000
Chemical Oxygen Demand (COD), lbs/day	400	400
Total Suspended Solids (TSS), lbs/day	65	65
Oil & Grease, mg/L	53	53
Parameter	Minimum	Maximum
pH	6.0	9.0
a	Average monthly effluent limit means the highest allowable average of daily discharges over a calendar month. To calculate the discharge value to compare to the limit, you add the value of each daily discharge measured during a calendar month and divide this sum by the total number of daily discharges measured.	
b	Maximum daily effluent limit means the highest allowable daily discharge. The daily discharge means the discharge of a pollutant measured during a calendar day. For pollutants with limits expressed in units of mass, calculate the daily discharge as the total mass of the pollutant discharged over the day. For other units of measurement, the daily discharge is the average measurement of the pollutant over the day. This does not apply to pH.	

S2. MONITORING REQUIREMENTS

A. Monitoring Requirements

The Permittee must monitor the wastewater and production according to the following schedule:

The Permittee must monitor in accordance with the following schedule and the requirements specified in Appendix A.

Parameter	Units	Sampling Frequency	Sample Type
(1) Final Wastewater Effluent			
Flow	gallons/day (gpd)	Once per day (Daily)	Metered
Chemical Oxygen Demand (COD)	mg/L	Monthly	24- hour Composite ^b
COD	lbs/day		Calculated
Total Suspended Solids (TSS)	mg/L	Monthly	24- hour Composite
TSS	lbs/day		Calculated
Boron	mg/L	Monthly	24- hour Composite
pH	Standard Units	Continuous	Metered
PRIORITY POLLUTANTS			
Cyanide	µg/L	2/permit cycle ^c	Grab ^a
Total Phenolic Compounds	µg/L	2/permit cycle	24-Hour composite
Priority Pollutants (PP) – Total Metals	µg/L; ng/L for mercury	2/permit cycle	24-Hour composite, grab mercury
PP – Volatile Organic Compounds	µg/L	2/permit cycle	24-Hour composite
PP – Volatile Organic Compounds	µg/L	2/permit cycle	24-Hour composite
PP – Acid-extractable Compounds	µg/L	2/permit cycle	24-Hour composite
PP-Dioxin	pg/L	2/permit cycle	24-Hour composite

Parameter	Units	Sampling Frequency	Sample Type
(2) Permit Renewal Application Requirements – Final Wastewater Effluent			
Submit five year data for the analytes shown under S1 (Final wastewater effluent)			
a	Grab means an individual sample collected over a fifteen (15) minute, or less, period.		
b	24-hour composite means a series of individual samples collected over a 24-hour period into a single container, and analyzed as one sample.		
c	2 nd quarter of 2018 and 3 rd quarter of 2020		

B. Sampling and Analytical Procedures

Samples and measurements taken to meet the requirements of this permit must represent the volume and nature of the monitored parameters, including representative sampling of any unusual discharge or discharge condition, including bypasses, upsets and maintenance-related conditions affecting effluent quality.

Sampling and analytical methods used to meet the water and wastewater monitoring requirements specified in this permit must conform to the latest revision of the following rules and documents unless otherwise specified in this permit or approved in writing by the Department of Ecology (Ecology).

- Guidelines Establishing Test Procedures for the Analysis of Pollutants contained in 40 CFR Part 136
- Standard Methods for the Examination of Water and Wastewater (APHA)

C. Flow Measurement, and Continuous Monitoring Devices

The Permittee must:

1. Select and use appropriate flow measurement, and continuous monitoring devices and methods consistent with accepted scientific practices.
2. Install, calibrate, and maintain these devices to ensure the accuracy of the measurements is consistent with the accepted industry standard, the manufacturer's recommendation, and approved O&M manual procedures for the device and the wastestream.
3. Calibrate continuous monitoring instruments weekly unless it can demonstrate a longer period is sufficient based on monitoring records. The Permittee:
 - a. Must calibrate continuous pH measurement instruments using a grab sample analyzed in the lab with a pH meter calibrated with standard buffers and analyzed within 15 minutes of sampling.
4. Use field measurement devices as directed by the manufacturer and do not use reagents beyond their expiration dates.

5. Establish a calibration frequency for each device or instrument in the O&M manual that conforms to the frequency recommended by the manufacturer.
6. Calibrate flow-monitoring devices at a minimum frequency of at least one calibration per year.
7. Maintain calibration records for at least three years.

D. Laboratory Accreditation

The Permittee must ensure that all monitoring data required by Ecology for permit specified parameters is prepared by a laboratory registered or accredited under the provisions of chapter 173-50 Washington Administrative Code (WAC), *Accreditation of Environmental Laboratories*. Flow, temperature, settleable solids, conductivity, pH, and internal process control parameters are exempt from this requirement.

E. Request for Reduction in Monitoring

The Permittee may request a reduction of the sampling frequency after twelve (12) months of monitoring. Ecology will review each request and at its discretion grant the request when it reissues the permit or by a permit modification.

The Permittee must:

1. Provide a written request.
2. Clearly state the parameters for which it is requesting reduced monitoring.
3. Clearly state the justification for the reduction.

S3. **REPORTING AND RECORDING REQUIREMENTS**

The Permittee must monitor and report in accordance with the following conditions. Falsification of information submitted to Ecology is a violation of the terms and conditions of this permit.

A. Discharge Monitoring Reports

The first monitoring period begins on the effective date of the permit (unless otherwise specified). The Permittee must:

1. Summarize, report, and submit monitoring data obtained during each monitoring period on the electronic discharge monitoring report (DMR) form provided by Ecology within the Water Quality Permitting Portal. Include data for each of the parameters tabulated in Special Condition S2 and as required by the form. Report a value for each day sampling occurred (unless specifically exempted in the permit) and for the summary values (when applicable) included on the electronic form.

To find out more information and to sign up for the Water Quality Permitting Portal go to: <http://www.ecy.wa.gov/programs/wq/permits/paris/webdmr.html>

2. Enter the "No Discharge" reporting code for an entire DMR, for a specific monitoring point, or for a specific parameter as appropriate, if the Permittee did not discharge wastewater or a specific pollutant during a given monitoring period.
3. Report single analytical values below detection as "less than the detection level (DL)" by entering < followed by the numeric value of the detection level (e.g. < 2.0) on the DMR. If the method used did not meet the minimum DL and quantitation level (QL) identified in the permit, report the actual QL and DL in the comments or in the location provided.
4. Report the test method used for analysis in the comments if the laboratory used an alternative method not specified in the permit and as allowed in Appendix A.
5. Calculate average values and calculated total values (unless otherwise specified in the permit) using:
 - a. The reported numeric value for all parameters measured between the agency-required detection value and the agency-required quantitation value.
 - b. One-half the detection value (for values reported below detection) if the lab detected the parameter in another sample from the same monitoring point for the reporting period.
 - c. Zero (for values reported below detection) if the lab did not detect the parameter in another sample for the reporting period.
6. Report single-sample grouped parameters (for example: priority pollutants, PAHs, pulp and paper chlorophenolics, TTOs) on the WQWebDMR form and include: sample date, concentration detected, detection limit (DL) (as necessary), and laboratory quantitation level (QL) (as necessary).

The Permittee must also submit an electronic copy of the laboratory report as an attachment using WQWebDMR. The contract laboratory reports must also include information on the chain of custody, QA/QC results, and documentation of accreditation for the parameter.
7. Ensure that DMRs are electronically submitted no later than the dates specified below, unless otherwise specified in this permit.
8. Submit DMRs for parameters with the monitoring frequencies specified in S2 (monthly, quarterly, annual, etc.) at the reporting schedule identified below. The Permittee must:
 - a. Submit **monthly** DMRs by the 15th day of the following month.
 - b. Submit permit renewal application monitoring data in WQWebDMR as required in Special Condition S2 by **November 1, 2020**.

B. Permit Submittals and Schedules

The Permittee must use the Water Quality Permitting Portal – Permit Submittals application (unless otherwise specified in the permit) to submit all other written permit-required reports by the date specified in the permit.

When another permit condition requires submittal of a paper (hard-copy) report, the Permittee must ensure that it is postmarked or received by Ecology no later than the dates specified by this permit. Send these paper reports to Ecology at:

Water Quality Permit Coordinator
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

C. Records Retention

The Permittee must retain records of all monitoring information for a minimum of three years. Such information must include all calibration and maintenance records and all original recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit. The Permittee must extend this period of retention during the course of any unresolved litigation regarding the discharge of pollutants by the Permittee or when requested by Ecology.

D. Recording of Results

For each measurement or sample taken, the Permittee must record the following information:

1. The date, exact place, method, and time of sampling or measurement.
2. The individual who performed the sampling or measurement.
3. The dates the analyses were performed.
4. The individual who performed the analyses.
5. The analytical techniques or methods used.
6. The results of all analyses.

E. Additional Monitoring by the Permittee

If the Permittee monitors any pollutant more frequently than required by Condition S2 of this permit, then the Permittee must include the results of such monitoring in the calculation and reporting of the data submitted in the Permittee's DMR unless otherwise specified by Condition S2.

F. Reporting Permit Violations

The Permittee must take the following actions when it violates or is unable to comply with any permit condition:

1. Immediately take action to stop, contain, and cleanup unauthorized discharges or otherwise stop the noncompliance and correct the problem.
2. If applicable, immediately repeat sampling and analysis. Submit the results of any repeat sampling to Ecology within thirty (30) days of sampling.

a. Immediate Reporting

The Permittee must report any noncompliance that may endanger health or the environment immediately to the Department of Ecology's Regional Office 24-hr. number listed below:

Southwest Regional Office 360-407-6300

b. Twenty-Four-Hour Reporting

The Permittee must report the following occurrences of noncompliance by telephone, to Ecology at the telephone numbers listed above, within 24 hours from the time the Permittee becomes aware of any of the following circumstances. The Permittee must report:

- i. Any noncompliance that may endanger health or the environment, unless previously reported under immediate reporting requirements.
- ii. Any unanticipated bypass that causes an exceedance of an effluent limit in the permit (See Part S4.B., "Bypass Procedures").
- iii. Any upset that causes an exceedance of an effluent limit in the permit. Upset means 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, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
- iv. Any violation of a maximum daily or instantaneous maximum discharge limit for any of the pollutants in Section S1.A of this permit.
- v. Any overflow prior to the treatment works, whether or not such overflow endangers health or the environment or exceeds any effluent limit in the permit. This requirement does not include

industrial process wastewater overflows to impermeable surfaces which are collected and routed to the treatment works.

c. Report within Five Days

The Permittee must also submit a written report within five days of the time that the Permittee becomes aware of any reportable event under subparts a or b, above. The report must contain:

- i. A description of the noncompliance and its cause.
- ii. The period of noncompliance, including exact dates and times.
- iii. The estimated time the Permittee expects the noncompliance to continue if not yet corrected.
- iv. Steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.
- v. If the noncompliance involves an overflow prior to the treatment works, an estimate of the quantity (in gallons) of untreated overflow.

d. Waiver of Written Reports

Ecology may waive the written report required in subpart c, above, on a case-by-case basis upon request if the Permittee has submitted a timely oral report.

e. All Other Permit Violation Reporting

The Permittee must report all permit violations, which do not require immediate or within 24 hours reporting, when it submits monitoring reports for S3.A ("Reporting"). The reports must contain the information listed in subpart c, above. Compliance with these requirements does not relieve the Permittee from responsibility to maintain continuous compliance with the terms and conditions of this permit or the resulting liability for failure to comply.

G. Other Reporting

1. Spills of Oil or Hazardous Materials

The Permittee must report a spill of oil or hazardous materials in accordance with the requirements of Revised Code of Washington (RCW) 90.56.280 and chapter 173-303-145. You can obtain further instructions at the following website: <http://www.ecy.wa.gov/programs/spills/other/reportaspill.html> .

2. Failure to Submit Relevant or Correct Facts

Where the Permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application, or in any report to Ecology, it must submit such facts or information promptly.

H. Maintaining a Copy of this Permit

The Permittee must keep a copy of this permit at the facility and make it available upon request to Ecology inspectors.

I. Dangerous Waste Discharge Notification

The Permittee must notify the publicly owned treatment works (POTW) and Ecology in writing of the intent to discharge into the POTW any substance designated as a dangerous waste in accordance with the provisions of WAC 173-303-070. It must make this notification at least 90 days prior to the date that it proposes to initiate the discharge. The Permittee must not discharge this substance until authorized by Ecology and the POTW. It must also comply with the notification requirements of Special Condition S8 and General Condition G4.

J. Spill Notification

The Permittee must notify the POTW immediately (as soon as discovered) of all discharges that could cause problems to the POTW, such as process spills and unauthorized discharges (including slug discharges).

S4. OPERATION AND MAINTENANCE

The Permittee must, at all times, properly operate and maintain all facilities or systems of treatment and control (and related appurtenances) which are installed to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems, which are installed by a Permittee only when the operation is necessary to achieve compliance with the conditions of this permit.

A. Operations and Maintenance Manual

1. O&M Manual Submittal and Requirements

The Permittee must:

- a. Prepare the Operations and Maintenance (O&M) Manual that meets the requirements of WAC 173-240-150 and submit it to Ecology for approval by **January 2, 2018**.
- b. Submit to Ecology for review and approval substantial changes or updates to the O&M Manual whenever it incorporates them into the manual.
- c. Keep the approved O&M Manual at the permitted facility.

- d. Follow the instructions and procedures of this manual.
2. O&M Manual Components

In addition to the requirements of WAC 173-240-150, the O&M manual must include:

- a. Emergency procedures for plant shutdown and cleanup in event of wastewater system upset, spill, failure, or demand by the POTW treating the discharge.
- b. Wastewater system maintenance procedures that contribute to the generation of process wastewater.
- c. Any directions to maintenance staff when cleaning, or maintaining other equipment or performing other tasks which are necessary to protect the operation of the wastewater system (for example, defining maximum allowable discharge rate for draining a tank, blocking all floor drains before beginning the overhaul of a stationary engine.)
- d. Wastewater sampling protocols and procedures for compliance with the sampling and reporting requirements in the wastewater discharge permit.
- e. Minimum staffing adequate to operate and maintain the treatment processes and carry out compliance monitoring required by the permit.
- f. Treatment plant process control monitoring schedule.

B. Bypass Procedures

This permit prohibits a bypass, which is the intentional diversion of waste streams from any portion of a treatment facility. Ecology may take enforcement action against a Permittee for a bypass unless one of the following circumstances (1, 2, or 3) applies.

- 1. Bypass for essential maintenance without the potential to cause violation of permit limits or conditions.

This permit authorizes a bypass if it allows for essential maintenance and does not have the potential to cause violations of limits or other conditions of this permit, or adversely impact public health as determined by Ecology prior to the bypass. The Permittee must submit prior notice, if possible, at least ten (10) days before the date of the bypass.

- 2. Bypass is unavoidable, unanticipated, and results in noncompliance of this permit.

This permit authorizes such a bypass only if:

- a. Bypass is unavoidable to prevent loss of life, personal injury, or severe property damage. "Severe property damage" means substantial physical damage to property, damage to the treatment facilities which would cause

them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass.

b. No feasible alternatives to the bypass exist, such as:

- The use of auxiliary treatment facilities.
- Retention of untreated wastes.
- Stopping production.
- Maintenance during normal periods of equipment downtime, but not if the Permittee should have installed adequate backup equipment in the exercise of reasonable engineering judgment to prevent a bypass.
- Transport of untreated wastes to another treatment facility.

c. The Permittee has properly notified Ecology of the bypass as required in Condition S3.F of this permit.

3. If bypass is anticipated and has the potential to result in noncompliance of this permit.

a. The Permittee must notify Ecology at least 30 days before the planned date of bypass. The notice must contain:

- A description of the bypass and its cause.
- An analysis of all known alternatives which would eliminate, reduce, or mitigate the need for bypassing.
- A cost-effectiveness analysis of alternatives including comparative resource damage assessment.
- The minimum and maximum duration of bypass under each alternative.
- A recommendation as to the preferred alternative for conducting the bypass.
- The projected date of bypass initiation.
- A statement of compliance with State Environmental Policy Act (SEPA).
- A request for modification of water quality standards as provided for in WAC 173-201A-410, if an exceedance of any water quality standard is anticipated.

- Details of the steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass.
- b. For probable construction bypasses, the Permittee must notify Ecology of the need to bypass as early in the planning process as possible. The Permittee must consider the analysis required above during the project planning and design process. The project-specific engineering report or facilities plan as well as the plans and specifications must include details of probable construction bypasses to the extent practical. In cases where the Permittee determines the probable need to bypass early, the Permittee must continue to analyze conditions up to and including the construction period in an effort to minimize or eliminate the bypass.
- c. Ecology will consider the following prior to issuing an administrative order for this type of bypass:
 - If the bypass is necessary to perform construction or maintenance-related activities essential to meet the requirements of this permit.
 - If feasible alternatives to bypass exist, such as the use of auxiliary treatment facilities, retention of untreated wastes, stopping production, maintenance during normal periods of equipment down time, or transport of untreated wastes to another treatment facility.
 - If the Permittee planned and scheduled the bypass to minimize adverse effects on the public and the environment.

After consideration of the above and the adverse effects of the proposed bypass and any other relevant factors, Ecology will approve or deny the request. Ecology will give the public an opportunity to comment on bypass incidents of significant duration, to the extent feasible. Ecology will approve a request to bypass by issuing an administrative order under RCW 90.48.120.

S5. PROHIBITED DISCHARGES

The Permittee must comply with these General and Specific Prohibitions.

A. General Prohibitions

The Permittee must not introduce into the POTW pollutant(s), which cause Pass Through or Interference.

B. Specific Prohibitions

In addition, the Permittee must not introduce the following into the POTW:

1. Pollutants which create a fire or explosion hazard in the POTW, including, but not limited to, waste streams with a closed cup flashpoint of less than 60 degrees C

(140 degrees F) using the test methods specified in 40 Code of Federal Regulations (CFR) 261.21

2. Solid or viscous pollutants in amounts, which will cause obstruction to the flow in the POTW resulting in interference
3. Any pollutant (including oxygen-demanding pollutants (BOD₅, etc.), released in a discharge at a flow rate and/or pollutant concentration that will cause interference with the POTW
4. Heat in amounts which will inhibit biological activity in the POTW resulting in interference, but in no case heat in such quantities that the temperature at the POTW treatment plant exceeds 40 degrees C (104 degrees F) unless the approval authority, upon request of the POTW, approves alternative temperature limits
5. Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through
6. Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems
7. Any trucked or hauled pollutants, except at discharge points designated by the POTW

C. Prohibited Unless Approved

Any of the following discharges are prohibited unless approved by Ecology under extraordinary circumstances (such as a lack of direct discharge alternatives due to combined sewer service or a need to augment sewage flows due to septic conditions):

1. Noncontact cooling water in significant volumes
2. Storm water and other direct inflow sources
3. Wastewaters significantly affecting system hydraulic loading, which do not require treatment or would not be afforded a significant degree of treatment by the system
4. The discharge of dangerous wastes as defined in Chapter 173-303 WAC (Unless specifically authorized in this permit)

S6. DILUTION PROHIBITED

The Permittee must not dilute the wastewater discharge with stormwater or increase the use of potable water, process water, noncontact cooling water, or, in any way, attempt to dilute an effluent as a partial or complete substitute for adequate treatment to achieve compliance with the limits contained in this permit.

S7. SOLID WASTE DISPOSAL

A. Solid Waste Handling

The Permittee must handle and dispose of all solid waste material in such a manner as to prevent its entry into state ground or surface water.

B. Leachate

The Permittee must not allow leachate from its solid waste material to enter state waters without providing all known, available, and reasonable methods of treatment, nor allow such leachate to cause violations of the State Surface Water Quality Standards, Chapter 173-201A WAC, or the State Ground Water Quality Standards, Chapter 173-200 WAC. The Permittee must apply for a permit or permit modification as may be required for such discharges to state ground or surface waters.

S8. APPLICATION FOR PERMIT RENEWAL OR MODIFICATION FOR FACILITY CHANGES

The Permittee must submit an application for renewal of this permit by **November 1, 2020**.

The Permittee must also submit a new application or addendum at least 180 days prior to commencement of discharges, resulting from the activities listed below, which may result in permit violations. These activities include any facility expansions, production increases, or other planned changes, such as process modifications, in the permitted facility.

S9. NON-ROUTINE AND UNANTICIPATED DISCHARGES

A. Beginning on the effective date of this permit, the Permittee is authorized to discharge non-routine wastewater on a case-by-case basis to the sanitary sewer if approved by Ecology and the POTW. Prior to any such discharge, the Permittee must contact Ecology and **at a minimum** provide the following information:

1. The proposed discharge location
2. The nature of the activity that will generate the discharge
3. Any alternatives to the discharge, such as reuse, storage, or recycling of the water
4. The total volume of water it expects to discharge
5. The results of the chemical analysis of the water
6. The date of proposed discharge
7. The expected rate of discharge discharged, in gallons per day
8. The expected rate of discharge in gallons per minute for discharges greater than 20,000 gallons

B. The Permittee must analyze the water for all constituents limited for the discharge and report them as required by subpart A.5 above. The analysis must also include any

parameter deemed necessary by Ecology. All discharges must comply with the effluent limits as established in Condition S1 of this permit and any other limits imposed by Ecology.

- C. The discharge cannot proceed until Ecology has reviewed the information provided and has authorized the discharge by letter to the Permittee or by an Administrative Order.

S10. SPILL CONTROL PLAN

A. Spill Control Plan Submittals and Requirements

The Permittee must:

1. Submit to Ecology an update to the existing spill control plan by **July 15, 2019**.
2. Review the plan at least annually and update the spill plan as needed.
3. Send changes to the plan to Ecology.
4. Follow the plan and any supplements throughout the term of the permit.

B. Spill Control Plan Components

The spill control plan must include the following:

1. A list of all oil and petroleum products and other materials used and/or stored on-site, which when spilled, or otherwise released into the environment, designate as Dangerous Waste (DW) or Extremely Hazardous Waste (EHW) by the procedures set forth in WAC 173-303-070. Include other materials used and/or stored on-site, which may become pollutants or cause pollution upon reaching state's waters.
2. A description of preventive measures and facilities (including an overall facility plot showing drainage patterns) which prevent, contain, or treat spills of these materials.
3. A description of the reporting system the Permittee will use to alert responsible managers and legal authorities in the event of a spill.
4. A description of operator training to implement the plan.

The Permittee may submit plans and manuals required by 40 CFR Part 112, contingency plans required by Chapter 173-303 WAC, or other plans required by other agencies, which meet the intent of this section.

S11. SLUG DISCHARGE CONTROL PLAN

A. Slug Discharge Control Plan Submittal and Requirements

The Permittee must:

1. Review its Slug Discharge Plan and update it as needed.

2. Submit all revisions or updates of this plan to Ecology for review and approval.
3. Keep the current approved plan on the plant site and make it readily available to facility personnel.
4. Follow the approved plan and any approved supplements throughout the term of the permit.
5. Submit an update of the slug discharge control plan, or a certification that it is current by **July 15, 2019**.

B. Slug Discharge Control Plan Components

The slug discharge control plan must include the following information and procedures relating to the prevention of unauthorized slug discharges; it must include:

1. A description of a reporting system the Permittee will use to immediately notify facility management, the POTW operator, and appropriate state, federal, and local authorities of any slug discharges, and provisions to provide a written follow-up report within five days.
2. A description of operator training, equipment, and facilities (including overall facility plan) for preventing, containing, or treating slug discharges.
3. Procedures to prevent adverse impact from accidental spills including:
 - a. Inspection and maintenance of storage areas
 - b. Handling and transfer of materials
 - c. Loading and unloading operations
 - d. Control of plant site run-off
 - e. Worker training
 - f. Building of containment structures or equipment
 - g. Measures for containing toxic organic pollutants (including solvents)
 - h. Measures and equipment for emergency response
4. A list of all raw materials, products, chemicals, and hazardous materials used, processed, or stored at the facility; the normal quantity maintained on the premises for each listed material; and a map showing where they are located.
5. A description of discharge practices for batch and continuous processes under normal and non-routine circumstances.
6. A brief description of any unauthorized discharges which occurred during the 36-month period preceding the effective date of this permit and subsequent measures

taken by Permittee to prevent or to reduce the possibility of further unauthorized discharges.

7. An implementation schedule including additional operator training and procurement and installation of equipment or facilities required to properly implement the plan.

GENERAL CONDITIONS

G1. SIGNATORY REQUIREMENTS

All applications, reports, or information submitted to Ecology must be signed as follows:

- A. All permit applications must be signed by either a principal executive officer or ranking elected official.
- B. All reports required by this permit and other information requested by Ecology must be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:
 - 1. The authorization is made in writing by the person described above and is submitted to Ecology at the time of authorization, and
 - 2. The authorization specifies either a named individual or any individual occupying a named position.
- C. Changes to Authorization. If an authorization under paragraph G1.B. above is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization must be submitted to Ecology prior to or together with any reports, information, or applications to be signed by an authorized representative.
- D. Certification. Any person signing a document under this section must make the following certification:

"I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

G2. RIGHT OF ENTRY

Representatives of Ecology have the right to enter at all reasonable times in or upon any property, public or private, for the purpose of inspecting and investigating conditions relating to the pollution or the possible pollution of any waters of the state. Reasonable times include normal business hours; hours during which production, treatment, or discharge occurs; or times when Ecology suspects a violation requiring immediate inspection. Representatives of Ecology must be allowed to have access to, and copy at reasonable cost, any records required to be kept under terms and conditions of the permit; to inspect any monitoring equipment or method required in the permit; and to sample the discharge, waste treatment processes, or internal waste streams.

G3. PERMIT ACTIONS

This permit is subject to modification, suspension, or termination, in whole or in part by Ecology for any of the following causes:

- A. Violation of any permit term or condition;
- B. Obtaining a permit by misrepresentation or failure to disclose all relevant facts;
- C. A material change in quantity or type of waste disposal;
- D. A material change in the condition of the waters of the state; or
- E. Nonpayment of fees assessed pursuant to RCW 90.48.465.

Ecology may also modify this permit, including the schedule of compliance or other conditions, if it determines good and valid cause exists, including promulgation or revisions of regulations or new information.

G4. REPORTING A CAUSE FOR MODIFICATION

The Permittee must submit a new application, or a supplement to the previous application, along with required engineering plans and reports, whenever a new or increased discharge or change in the nature of the discharge is anticipated which is not specifically authorized by this permit. This application must be submitted at least one hundred eighty (180) days prior to any proposed changes. Submission of this application does not relieve the Permittee of the duty to comply with the existing permit until it is modified or reissued.

G5. PLAN REVIEW REQUIRED

Prior to constructing or modifying any wastewater control facilities, an engineering report and detailed plans and specifications must be submitted to Ecology for approval in accordance with Chapter 173-240 WAC. Engineering reports, plans, and specifications should be submitted at least 180 days prior to the planned start of construction. Facilities must be constructed and operated in accordance with the approved plans.

G6. COMPLIANCE WITH OTHER LAWS AND STATUTES

Nothing in the permit excuses the Permittee from compliance with any applicable federal, state, or local statutes, ordinances, or regulations.

G7. TRANSFER OF THIS PERMIT

This permit is automatically transferred to a new owner or operator if:

- A. A written agreement between the old and new owner or operator containing a specific date for transfer of permit responsibility, coverage, and liability is submitted to Ecology;
- B. A copy of the permit is provided to the new owner and;
- C. Ecology does not notify the Permittee of the need to modify the permit.

Unless this permit is automatically transferred according to Section 1. above, this permit may be transferred only if it is modified to identify the new Permittee and to incorporate such other requirements as determined necessary by Ecology.

G8. REDUCED PRODUCTION FOR COMPLIANCE

The Permittee must control production or discharge to the extent necessary to maintain compliance with the terms and conditions of this permit upon reduction of efficiency, loss, or failure of its treatment facility until the treatment capacity is restored or an alternative method of treatment is provided. This requirement applies in the situation where, among other things, the primary source of power for the treatment facility is reduced, lost, or fails.

G9. REMOVED SUBSTANCES

Collected screenings, grit, solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters must not be resuspended or reintroduced to the effluent stream for discharge.

G10. PAYMENT OF FEES

The Permittee must submit payment of fees associated with this permit as assessed by Ecology. Ecology may revoke this permit if the permit fees established under Chapter 173-224 WAC are not paid.

G11. PENALTIES FOR VIOLATING PERMIT CONDITIONS

Any person who is found guilty of willfully violating the terms and conditions of this permit is guilty of a crime, and upon conviction thereof shall be punished by a fine of up to ten thousand dollars and costs of prosecution, or by imprisonment in the discretion of the court. Each day upon which a willful violation occurs is a separate and additional violation.

Any person who violates the terms and conditions of a waste discharge permit incurs, in addition to any other penalty as provided by law, a civil penalty in the amount of up to ten thousand dollars for every such violation. Each and every such violation is a separate and distinct offense, and in case of a continuing violation, every day's continuance is a separate and distinct violation.

G12. DUTY TO PROVIDE INFORMATION

The Permittee must submit to Ecology, within a reasonable time, all information which Ecology may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. The Permittee must also submit to Ecology upon request, copies of records required to be kept by this permit.

G13. DUTY TO COMPLY

The Permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of chapter 90.48 RCW and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.

APPENDIX A

LIST OF POLLUTANTS WITH ANALYTICAL METHODS, DETECTION LIMITS AND QUANTITATION LEVELS

The Permittee must use the specified analytical methods, detection limits (DLs) and quantitation levels (QLs) in the following table for permit and application required monitoring unless:

- Another permit condition specifies other methods, detection levels, or quantitation levels.
- The method used produces measurable results in the sample and EPA has listed it as an EPA-approved method in 40 CFR Part 136.

If the Permittee uses an alternative method, not specified in the permit and as allowed above, it must report the test method, DL, and QL on the discharge monitoring report or in the required report.

If the Permittee is unable to obtain the required DL and QL in its effluent due to matrix effects, the Permittee must submit a matrix-specific detection limit (MDL) and a quantitation limit (QL) to Ecology with appropriate laboratory documentation.

When the permit requires the Permittee to measure the base neutral compounds in the list of priority pollutants, it must measure all of the base neutral pollutants listed in the table below. The list includes EPA required base neutral priority pollutants and several additional polynuclear aromatic hydrocarbons (PAHs). The Water Quality Program added several PAHs to the list of base neutrals below from Ecology's Persistent Bioaccumulative Toxics (PBT) List. It only added those PBT parameters of interest to Appendix A that did not increase the overall cost of analysis unreasonably.

Ecology added this appendix to the permit in order to reduce the number of analytical "non-detects" in permit-required monitoring and to measure effluent concentrations near or below criteria values where possible at a reasonable cost.

The lists below include conventional pollutants (as defined in CWA section 502(6) and 40 CFR Part 122.), toxic or priority pollutants as defined in CWA section 307(a)(1) and listed in 40 CFR Part 122 Appendix D, 40 CFR Part 401.15 and 40 CFR Part 423 Appendix A), and nonconventionals. 40 CFR Part 122 Appendix D (Table V) also identifies toxic pollutants and hazardous substances which are required to be reported by dischargers if expected to be present. This permit appendix A list does not include those parameters.

CONVENTIONAL POLLUTANTS

Pollutant	CAS Number (if available)	Recommended Analytical Protocol	Detection (DL) ¹ µg/L unless specified	Quantitation Level (QL) ² µg/L unless specified
Biochemical Oxygen Demand		SM5210-B		2 mg/L
Biochemical Oxygen Demand, Soluble		SM5210-B ³		2 mg/L

Fecal Coliform		SM 9221E,9222	N/A	Specified in method - sample aliquot dependent
Oil and Grease (HEM) (Hexane Extractable Material)		1664 A or B	1,400	5,000
pH		SM4500-H ⁺ B	N/A	N/A
Total Suspended Solids		SM2540-D		5 mg/L

NONCONVENTIONAL POLLUTANTS

Pollutant & CAS No. (if available)	CAS Number (if available)	Recommended Analytical Protocol	Detection (DL) ¹ µg/L unless specified	Quantitation Level (QL) ² µg/L unless specified
Alkalinity, Total		SM2320-B		5 mg/L as CaCO ₃
Aluminum, Total	7429-90-5	200.8	2.0	10
Ammonia, Total (as N)		SM4500-NH ₃ -B and C/D/E/G/H		20
Barium Total	7440-39-3	200.8	0.5	2.0
BTEX (benzene +toluene + ethylbenzene + m,o,p xylenes)		EPA SW 846 8021/8260	1	2
Boron, Total	7440-42-8	200.8	2.0	10.0
Chemical Oxygen Demand		SM5220-D		10 mg/L
Chloride		SM4500-Cl B/C/D/E and SM4110 B		Sample and limit dependent
Chlorine, Total Residual		SM4500 Cl G		50.0
Cobalt, Total	7440-48-4	200.8	0.05	0.25
Color		SM2120 B/C/E		10 color units
Dissolved oxygen		SM4500-OC/OG		0.2 mg/L
Flow		Calibrated device		
Fluoride	16984-48-8	SM4500-F E	25	100
Hardness, Total		SM2340B		200 as CaCO ₃

NONCONVENTIONAL POLLUTANTS

Pollutant & CAS No. (if available)	CAS Number (if available)	Recommended Analytical Protocol	Detection (DL) ¹ µg/L unless specified	Quantitation Level (QL) ² µg/L unless specified
Iron, Total	7439-89-6	200.7	12.5	50
Magnesium, Total	7439-95-4	200.7	10	50
Manganese, Total	7439-96-5	200.8	0.1	0.5
Molybdenum, Total	7439-98-7	200.8	0.1	0.5
Nitrate + Nitrite Nitrogen (as N)		SM4500-NO3-E/F/H		100
Nitrogen, Total Kjeldahl (as N)		SM4500-N _{org} B/C and SM4500NH ₃ -B/C/D/EF/G/H		300
NWTPH Dx ⁴		Ecology NWTPH Dx	250	250
NWTPH Gx ⁵		Ecology NWTPH Gx	250	250
Phosphorus, Total (as P)		SM 4500 PB followed by SM4500-PE/PF	3	10
Salinity		SM2520-B		3 practical salinity units or scale (PSU or PSS)
Settleable Solids		SM2540 -F		Sample and limit dependent
Soluble Reactive Phosphorus (as P)		SM4500-P E/F/G	3	10
Sulfate (as mg/L SO ₄)		SM4110-B		0.2 mg/L
Sulfide (as mg/L S)		SM4500-S ² F/D/E/G		0.2 mg/L
Sulfite (as mg/L SO ₃)		SM4500-SO3B		2 mg/L
Temperature (max. 7-day avg.)		Analog recorder or Use micro-recording devices known as thermistors		0.2° C

NONCONVENTIONAL POLLUTANTS

Pollutant & CAS No. (if available)	CAS Number (if available)	Recommended Analytical Protocol	Detection (DL)¹ µg/L unless specified	Quantitation Level (QL)² µg/L unless specified
Tin, Total	7440-31-5	200.8	0.3	1.5
Titanium, Total	7440-32-6	200.8	0.5	2.5
Total Coliform		SM 9221B, 9222B, 9223B	N/A	Specified in method - sample aliquot dependent
Total Organic Carbon		SM5310-B/C/D		1 mg/L
Total dissolved solids		SM2540 C		20 mg/L

PRIORITY POLLUTANTS	PP #	CAS Number (if available)	Recommended Analytical Protocol	Detection (DL)¹ µg/L unless specified	Quantitation Level (QL)² µg/L unless specified
METALS, CYANIDE & TOTAL PHENOLS					
Antimony, Total	114	7440-36-0	200.8	0.3	1.0
Arsenic, Total	115	7440-38-2	200.8	0.1	0.5
Beryllium, Total	117	7440-41-7	200.8	0.1	0.5
Cadmium, Total	118	7440-43-9	200.8	0.05	0.25
Chromium (hex) dissolved	119	18540-29-9	SM3500-Cr C	0.3	1.2
Chromium, Total	119	7440-47-3	200.8	0.2	1.0
Copper, Total	120	7440-50-8	200.8	0.4	2.0
Lead, Total	122	7439-92-1	200.8	0.1	0.5
Mercury, Total	123	7439-97-6	1631E	0.0002	0.0005
Nickel, Total	124	7440-02-0	200.8	0.1	0.5
Selenium, Total	125	7782-49-2	200.8	1.0	1.0
Silver, Total	126	7440-22-4	200.8	0.04	0.2
Thallium, Total	127	7440-28-0	200.8	0.09	0.36
Zinc, Total	128	7440-66-6	200.8	0.5	2.5

<i>PRIORITY POLLUTANTS</i>	PP #	CAS Number (if available)	Recommended Analytical Protocol	Detection (DL)¹ µg/L unless specified	Quantitation Level (QL)² µg/L unless specified
METALS, CYANIDE & TOTAL PHENOLS					
Cyanide, Total	121	57-12-5	335.4	5	10
Cyanide, Weak Acid Dissociable	121		SM4500-CN I	5	10
Cyanide, Free Amenable to Chlorination (Available Cyanide)	121		SM4500-CN G	5	10
Phenols, Total	65		EPA 420.1		50
ACID COMPOUNDS					
2-Chlorophenol	24	95-57-8	625	1.0	2.0
2,4-Dichlorophenol	31	120-83-2	625	0.5	1.0
2,4-Dimethylphenol	34	105-67-9	625	0.5	1.0
4,6-dinitro-o-cresol (2- methyl-4,6,-dinitrophenol)	60	534-52-1	625/1625B	2.0	4.0
2,4 dinitrophenol	59	51-28-5	625	1.5	3.0
2-Nitrophenol	57	88-75-5	625	0.5	1.0
4-Nitrophenol	58	100-02-7	625	1.0	2.0
Parachlorometa cresol (4- chloro-3-methylphenol)	22	59-50-7	625	1.0	2.0
Pentachlorophenol	64	87-86-5	625	0.5	1.0
Phenol	65	108-95-2	625	2.0	4.0
2,4,6-Trichlorophenol	21	88-06-2	625	2.0	4.0
VOLATILE COMPOUNDS					
Acrolein	2	107-02-8	624	5	10
Acrylonitrile	3	107-13-1	624	1.0	2.0
Benzene	4	71-43-2	624	1.0	2.0
Bromoform	47	75-25-2	624	1.0	2.0
Carbon tetrachloride	6	56-23-5	624/601 or SM6230B	1.0	2.0
Chlorobenzene	7	108-90-7	624	1.0	2.0
Chloroethane	16	75-00-3	624/601	1.0	2.0

PRIORITY POLLUTANTS	PP #	CAS Number (if available)	Recommended Analytical Protocol	Detection (DL)¹ µg/L unless specified	Quantitation Level (QL)² µg/L unless specified
METALS, CYANIDE & TOTAL PHENOLS					
2-Chloroethylvinyl Ether	19	110-75-8	624	1.0	2.0
Chloroform	23	67-66-3	624 or SM6210B	1.0	2.0
Dibromochloromethane (chlordibromomethane)	51	124-48-1	624	1.0	2.0
1,2-Dichlorobenzene	25	95-50-1	624	1.9	7.6
1,3-Dichlorobenzene	26	541-73-1	624	1.9	7.6
1,4-Dichlorobenzene	27	106-46-7	624	4.4	17.6
Dichlorobromomethane	48	75-27-4	624	1.0	2.0
1,1-Dichloroethane	13	75-34-3	624	1.0	2.0
1,2-Dichloroethane	10	107-06-2	624	1.0	2.0
1,1-Dichloroethylene	29	75-35-4	624	1.0	2.0
1,2-Dichloropropane	32	78-87-5	624	1.0	2.0
1,3-dichloropropene (mixed isomers) (1,2-dichloropropylene) ⁶	33	542-75-6	624	1.0	2.0
Ethylbenzene	38	100-41-4	624	1.0	2.0
Methyl bromide (Bromomethane)	46	74-83-9	624/601	5.0	10.0
Methyl chloride (Chloromethane)	45	74-87-3	624	1.0	2.0
Methylene chloride	44	75-09-2	624	5.0	10.0
1,1,2,2-Tetrachloroethane	15	79-34-5	624	1.9	2.0
Tetrachloroethylene	85	127-18-4	624	1.0	2.0
Toluene	86	108-88-3	624	1.0	2.0
1,2-Trans-Dichloroethylene (Ethylene dichloride)	30	156-60-5	624	1.0	2.0
1,1,1-Trichloroethane	11	71-55-6	624	1.0	2.0
1,1,2-Trichloroethane	14	79-00-5	624	1.0	2.0
Trichloroethylene	87	79-01-6	624	1.0	2.0

PRIORITY POLLUTANTS	PP #	CAS Number (if available)	Recommended Analytical Protocol	Detection (DL)¹ µg/L unless specified	Quantitation Level (QL)² µg/L unless specified
METALS, CYANIDE & TOTAL PHENOLS					
Vinyl chloride	88	75-01-4	624/SM6200B	1.0	2.0
BASE/NEUTRAL COMPOUNDS (compounds in bold are Ecology PBTs)					
Acenaphthene	1	83-32-9	625	0.2	0.4
Acenaphthylene	77	208-96-8	625	0.3	0.6
Anthracene	78	120-12-7	625	0.3	0.6
Benzidine	5	92-87-5	625	20	40
Benzyl butyl phthalate	67	85-68-7	625	0.3	0.6
Benzo(a)anthracene	72	56-55-3	625	0.3	0.6
Benzo(b)fluoranthene (3,4-benzofluoranthene) ⁷	74	205-99-2	610/625	0.8	1.6
Benzo(j)fluoranthene ⁷		205-82-3	625	0.5	1.0
Benzo(k)fluoranthene (11,12-benzofluoranthene) ⁷	75	207-08-9	610/625	0.8	1.6
Benzo(r,s,t)pentaphene		189-55-9	625	1.3	5.0
Benzo(a)pyrene	73	50-32-8	610/625	0.5	1.0
Benzo(ghi)Perylene	79	191-24-2	610/625	0.5	1.0
Bis(2-chloroethoxy)methane	43	111-91-1	625	5.3	21.2
Bis(2-chloroethyl)ether	18	111-44-4	611/625	0.3	1.0
Bis(2-chloroisopropyl)ether	42	39638-32-9	625	0.5	1.0
Bis(2-ethylhexyl)phthalate	66	117-81-7	625	0.3	1.0
4-Bromophenyl phenyl ether	41	101-55-3	625	0.3	0.5
2-Chloronaphthalene	20	91-58-7	625	0.3	0.6
4-Chlorophenyl phenyl ether	40	7005-72-3	625	0.3	0.5
Chrysene	76	218-01-9	610/625	0.3	0.6
Dibenzo (a,h)acridine		226-36-8	610M/625M	2.5	10.0
Dibenzo (a,j)acridine		224-42-0	610M/625M	2.5	10.0

PRIORITY POLLUTANTS	PP #	CAS Number (if available)	Recommended Analytical Protocol	Detection (DL)¹ µg/L unless specified	Quantitation Level (QL)² µg/L unless specified
METALS, CYANIDE & TOTAL PHENOLS					
Dibenzo(a-h)anthracene (1,2,5,6-dibenzanthracene)	82	53-70-3	625	0.8	1.6
Dibenzo(a,e)pyrene		192-65-4	610M/625M	2.5	10.0
Dibenzo(a,h)pyrene		189-64-0	625M	2.5	10.0
3,3-Dichlorobenzidine	28	91-94-1	605/625	2.0	14.0
Diethyl phthalate	70	84-66-2	625	1.9	7.6
Dimethyl phthalate	71	131-11-3	625	1.6	6.4
Di-n-butyl phthalate	68	84-74-2	625	0.5	1.0
2,4-dinitrotoluene	35	121-14-2	609/625	1.0	2.0
2,6-dinitrotoluene	36	606-20-2	609/625	1.0	2.0
Di-n-octyl phthalate	69	117-84-0	625	0.3	0.6
1,2-Diphenylhydrazine (as Azobenzene)	37	122-66-7	1625B	5.0	20
Fluoranthene	39	206-44-0	625	0.3	0.6
Fluorene	80	86-73-7	625	0.3	0.6
Hexachlorobenzene	9	118-74-1	612/625	0.3	0.6
Hexachlorobutadiene	52	87-68-3	625	0.5	1.0
Hexachlorocyclopentadiene	53	77-47-4	1625B/625	2.0	4.0
Hexachloroethane	12	67-72-1	625	0.5	1.0
Indeno(1,2,3-cd)Pyrene	83	193-39-5	610/625	0.5	1.0
Isophorone	54	78-59-1	625	0.5	1.0
3-Methyl cholanthrene		56-49-5	625	2.0	8.0
Naphthalene	55	91-20-3	625	0.4	0.75
Nitrobenzene	56	98-95-3	625	0.5	1.0
N-Nitrosodimethylamine	61	62-75-9	607/625	2.0	4.0
N-Nitrosodi-n-propylamine	63	621-64-7	607/625	0.5	1.0
N-Nitrosodiphenylamine	62	86-30-6	625	1.0	2.0
Perylene		198-55-0	625	1.9	7.6

PRIORITY POLLUTANTS	PP #	CAS Number (if available)	Recommended Analytical Protocol	Detection (DL)¹ µg/L unless specified	Quantitation Level (QL)² µg/L unless specified
METALS, CYANIDE & TOTAL PHENOLS					
Phenanthrene	81	85-01-8	625	0.3	0.6
Pyrene	84	129-00-0	625	0.3	0.6
1,2,4-Trichlorobenzene	8	120-82-1	625	0.3	0.6
DIOXIN					
2,3,7,8-Tetra- Chlorodibenzo-P-Dioxin (2,3,7,8 TCDD)	129	1746-01-6	1613B	1.3 pg/L	5 pg/L
PESTICIDES/PCBs					
Aldrin	89	309-00-2	608	0.025	0.05
alpha-BHC	102	319-84-6	608	0.025	0.05
beta-BHC	103	319-85-7	608	0.025	0.05
gamma-BHC (Lindane)	104	58-89-9	608	0.025	0.05
delta-BHC	105	319-86-8	608	0.025	0.05
Chlordane ⁸	91	57-74-9	608	0.025	0.05
4,4'-DDT	92	50-29-3	608	0.025	0.05
4,4'-DDE	93	72-55-9	608	0.025	0.05
4,4' DDD	94	72-54-8	608	0.025	0.05
Dieldrin	90	60-57-1	608	0.025	0.05
alpha-Endosulfan	95	959-98-8	608	0.025	0.05
beta-Endosulfan	96	33213-65-9	608	0.025	0.05
Endosulfan Sulfate	97	1031-07-8	608	0.025	0.05
Endrin	98	72-20-8	608	0.025	0.05
Endrin Aldehyde	99	7421-93-4	608	0.025	0.05
Heptachlor	100	76-44-8	608	0.025	0.05
Heptachlor Epoxide	101	1024-57-3	608	0.025	0.05
PCB-1242 ⁹	106	53469-21-9	608 - Modified	0.05	0.2
PCB-1254	107	11097-69-1	608 - Modified	0.05	0.2
PCB-1221	108	11104-28-2	608 - Modified	0.05	0.2
PCB-1232	109	11141-16-5	608 - Modified	0.05	0.2

PRIORITY POLLUTANTS	PP #	CAS Number (if available)	Recommended Analytical Protocol	Detection (DL)¹ µg/L unless specified	Quantitation Level (QL)² µg/L unless specified
METALS, CYANIDE & TOTAL PHENOLS					
PCB-1248	110	12672-29-6	608 - Modified	0.05	0.2
PCB-1260	111	11096-82-5	608 - Modified	0.05	0.2
PCB-1016 ⁹	112	12674-11-2	608 - Modified	0.05	0.2
Toxaphene	113	8001-35-2	608	0.24	0.5

1. Detection level (DL) or detection limit means the minimum concentration of an analyte (substance) that can be measured and reported with a 99% confidence that the analyte concentration is greater than zero as determined by the procedure given in 40 CFR part 136, Appendix B.
2. 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, or 5) x 10ⁿ, 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).
3. Soluble Biochemical Oxygen Demand method note: First, filter the sample through a Millipore Nylon filter (or equivalent) - pore size of 0.45-0.50 µm (prep all filters by filtering 250 ml of laboratory grade deionized water through the filter and discard). Then, analyze sample as per method 5210-B.
4. NWTPH Dx - Northwest Total Petroleum Hydrocarbons Diesel Extended Range – see <http://www.ecy.wa.gov/biblio/97602.html>
5. NWTPH Gx - Northwest Total Petroleum Hydrocarbons Gasoline Extended Range – see <http://www.ecy.wa.gov/biblio/97602.html>
6. 1, 3-dichloropropylene (mixed isomers) You may report this parameter as two separate parameters: cis-1, 3-dichloropropene (10061-01-5) and trans-1, 3-dichloropropene (10061-02-6).
7. Total Benzo(a)fluoranthenes - Because Benzo(b)fluoranthene, Benzo(j)fluoranthene and Benzo(k)fluoranthene co-elute you may report these three isomers as total benzo(a)fluoranthenes.

8. Chlordane – You may report alpha-chlordane (5103-71-9) and gamma-chlordane (5103-74-2) in place of chlordane (57-74-9). If you report alpha and gamma-chlordane, the DL/PQLs that apply are 0.025/0.050.
9. PCB 1016 & PCB 1242 – You may report these two PCB compounds as one parameter called PCB 1016/1242.



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

May 14, 2021

Ascensus Specialties LLC
4800 State Route 12
Elma, WA 98541

Re: Request to the Department of Ecology to Grant Confidentiality

Dear Ascensus Specialties LLC:

The Department of Ecology (Ecology) has reviewed your request to keep the following documents confidential:

- B.1 Raw Materials and Products,
- C.2 Overall Facility Water Balance,
- C.2.a LSBH Process Block Diagram, and
- C.2.b DSBH Process Block Diagram.

We have determined the documents meet confidentiality requirements of RCW 43.21A.160, and I am granting your request. Please note, these documents may be made available to the Ecology Director, appropriate Ecology staff, and the Attorney General's Office.

If you have any questions, please contact Aziz Mahar at azizullah.mahar@ecy.wa.gov or call (360) 407-6290 (office) or (360) 763-2787 (cell).

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Watson".

Laura Watson
Director

cc: Aziz Mahar, P.E., Environmental Engineer
Melanee Auldredge, Agency Public Disclosure Officer
Susie Baxter, Program Public Disclosure Coordinator