		State of Washington Department of Ecology WASTEWATER TREATMENT PLANT COMPLIANCE INSPECTION REPORT			Northwest Regional Office PO Box 330316 Shoreline, WA 98113 ph: (206) 594-0000 (rev. 5-28-21)		
Section A: General Information							
Report Version	PERMIT #	mm/dd/yy	Inspection Type	Inspector Code	Facility Type		
<input checked="" type="checkbox"/> New <input type="checkbox"/> Changed <input type="checkbox"/> Deleted	ST0045524	06/23/2023	I	S	<input checked="" type="checkbox"/> 2 Industrial		
Remarks							
Inspection work days	Facility Self-Monitoring	Photos Taken	Samples Taken	BI	QA		
0.5	N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	N	N		
Lead Ecology Inspector(s) Maia Hoffman							
Section B: Facility Data							
Name, Location, and Phone of Facility Inspected Romac Industries, Inc. – Sultan facility 125 South Sultan Basin Rd Sultan, WA 98294			Entry Time		Permit Effective Date		
			10:00 am		07/01/2020		
Name(s)/Title(s) of On-Site Representative(s) Benny Ensano, Environmental Engineer Bob Gilmore, EHS Manager Mike Armstrong, E-coat Lead			Exit Time		Permit Expiration Date		
			11:00 am		06/30/2025		
Name, Title, Address, Phone Number of Responsible Official Tom Lochman, Vice President of Operation 21919 20 th Ave SE, Ste 100 Bothell, WA 98021 (425) 951-6200			Ecology Staff On-Site Maia Hoffman				
			Other Facility Data				
Section C: Areas Evaluated During Inspection (Check only those areas evaluated)							
<input checked="" type="checkbox"/>	Permit	<input type="checkbox"/>	Flow Measurement	<input type="checkbox"/>	Operations & Maintenance	<input type="checkbox"/>	CSO/SSO (Sewer Overflow)
<input checked="" type="checkbox"/>	Records/Reports	<input type="checkbox"/>	Effluent ○ Receiving Water	<input type="checkbox"/>	Sludge Handling/Disposal	<input type="checkbox"/>	Pollution Prevention
<input checked="" type="checkbox"/>	Facility Site Review	<input type="checkbox"/>	Compliance Schedules	<input checked="" type="checkbox"/>	Pretreatment	<input type="checkbox"/>	Multimedia
<input checked="" type="checkbox"/>	Self-Monitoring Program	<input type="checkbox"/>	Laboratory	<input checked="" type="checkbox"/>	Storm Water	<input type="checkbox"/>	Other

Section D: Summary of Findings/Comments

I. INTRODUCTION

Ecology permit manager, Maia Hoffman, conducted a compliance review inspection at Romac on 6/23/2023. The focus of the inspection was to follow up on an effluent limit violation that occurred in January 2023 and to review recent permit related records. The inspection was announced to Benny Ensano via email. Brian Funk, City of Sultan WWTP Supervisor, participated in the inspection.

II. RESULTS AND DISCUSSIONIndustrial Processes and Wastewater Pretreatment:

Romac operates a ductile iron foundry, producing ductile iron castings. Wastewater is only produced from the electrocoating (e-coat) line. E-coat applies a corrosion resistant coating to the ductile iron parts. More information about the facility and operations is provided in the fact sheet to the permit, <https://apps.ecology.wa.gov/paris/DownloadDocument.aspx?Id=317266>.

The portion of the e-coat line that generates wastewater is the initial cleaning phase conducted in three tanks. The first stage (Tank 1) is the pre-treat containing a cleaner-coater solution. The cleaner used is Chemfos 51HD. The second stage (Tank 2) is a city water rinse. The third stage (Tank 3) is a reverse osmosis water rinse. Parts are then transferred for paint electrocoating. The painting process does not generate any wastewater.

Wastewater is generated from the pre-treat/rinse process when the tank contents need to be refreshed. Mike Armstrong leads

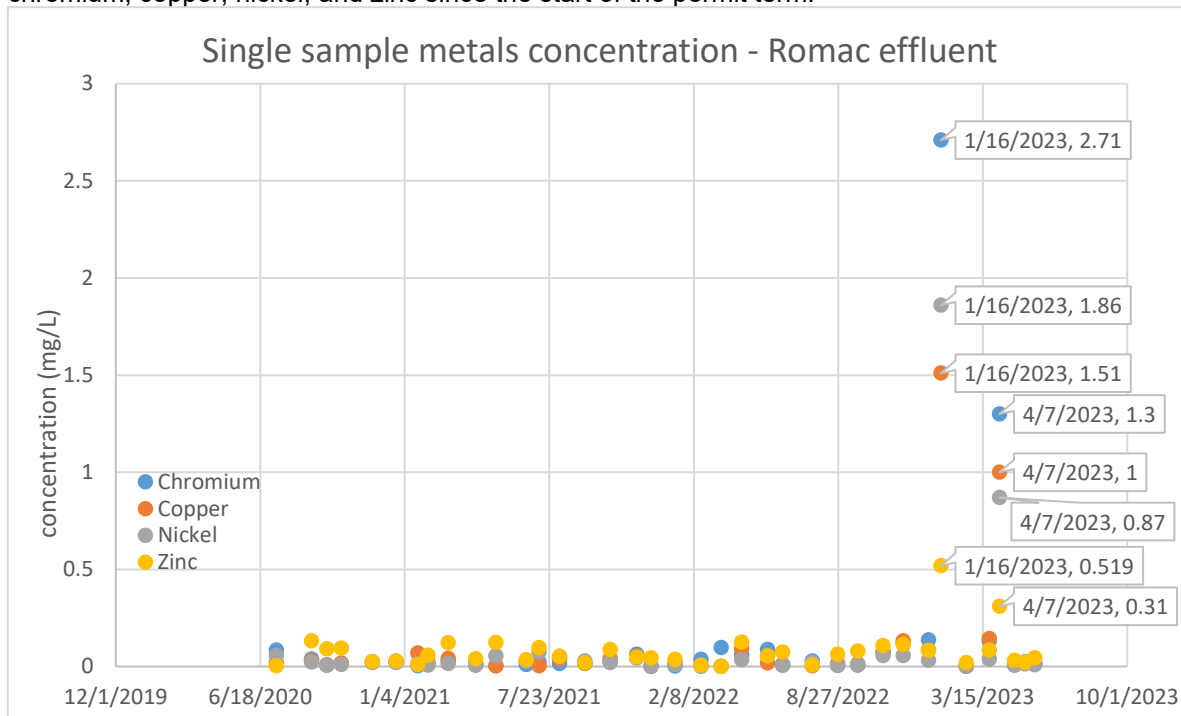
the e-coat process and wastewater management. M. Armstrong stated that wastewater is pumped to a 330-gallon portable tank. The pH is checked. If necessary, sodium bicarbonate is added to raise the pH. The tank is then trucked outside, staged on a holding rack, and allowed to drain into the sewer connection point. There are no floor drains in the facility. The only connection for industrial process wastewater to the sanitary sewer is at this outside location.

There have been no changes to the e-coat process or wastewater management system since the start of this permit term.

We toured the e-coat process area and discharge point during the site visit.

1/16 effluent limit exceedance and investigation:

The January 2023 monthly DMR showed a violation of the monthly average total chromium effluent limit. The monthly average total chromium effluent limit is 1.71 mg/L. The only sample taken in January was on 1/16 and had a measurement value of 2.71 mg/L. Since the 1/16 sample was the only sample analyzed for the month, the result is compared to both the monthly average and daily maximum limits in the permit for compliance. The graph below shows monitoring results for chromium, copper, nickel, and zinc since the start of the permit term.



During the site visit, the effluent limit exceedance was discussed. In general monitoring results for copper, nickel, and zinc were within permit limits, the results for the 1/16 sampling event were significantly higher than typical. Additionally, a sample taken on 4/7 shows higher results for chromium, copper, nickel, and zinc than typically expected (all results on 4/7 and averages from the month of April were within compliance with permit limits).

B. Ensano stated that first the quality of the lab results was evaluated. Samples in April were split between AMTest and ALS to compare results. B. Ensano stated ALS will be used in the future because ALS can get the results to Romac faster.

B. Ensano has been working with M. Armstrong to investigate the high metals results. Samples taken between 1/16 and 4/7 show results more in line with what was expected.

One leading hypothesis is that particles from parts or other nearby processes are entering the e-coat tanks.

We reviewed the e-coat discharge logs during the visit. M. Armstrong records each portable tank discharge date, pH before treatment, pH after treatment (if treatment necessary), operator responsible, which tank the wastewater is from, total gallons, and pH meter calibration occurrence. The discharges that occurred on 1/16 and 4/7 were wastewater from Tank 3, the R.O. rinse tank. As a comparison, the log showed on 2/20/2023 the discharge contained wastewater from Tank 1, the pre-treat tank. Monitoring results from sampling that occurred on 2/20 show metals concentrations in line with historical trends. B. Ensano said more investigation into the RO system and Tank 3 would be conducted.

We discussed possible implications to the Sultan WWTP. Metals entering a WWTP are typically more of a concern for the

biosolids than the effluent. However, given the small volume of wastewater discharged by Romac, the loading to Sultan WWTP from Romac is still minimal. B. Funk said he was sampling the biosolids every week for the past 3 years for biosolids permit requirements. He was not aware of any concerns with metals approaching or exceeding biosolids standards.

Records Review:

B. Ensano emailed the requested slug discharge control plan immediately after the site visit.

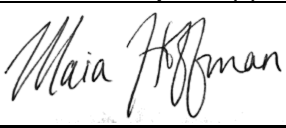

B. Ensano keeps well organized records on the wastewater discharges.

We discussed TTO reporting requirements.

III. CONCLUSION

Other than the January 2023 chromium limit exceedance, Romac is in good compliance with permit conditions.

Ecology requests B. Ensano communicate any findings into the chromium exceedance investigation as they relate to permit compliance.

Name(s) and Signatures of Inspector(s)	Agency/Office/Telephone	Date
Maia Hoffman 	WA Dept. of Ecology, NWRO, (425) 507-5681	6/27/2023
Name and Signature of Management QA Reviewer	Agency/Office/Telephone	Date
Monika Kannadaguli 	WA Dept. of Ecology, NWRO, (206) 594-0000	6/29/2023

ANNOUNCED Inspection

INSTRUCTIONS**Section A: General Information**

Report Version: N for 1st version, C for Changed or amended, or D for Delete

NPDES Permit No.: Enter the facility's NPDES or State permit number.

Inspection Date: Insert the date entry was made into the facility. Use the month/day/year format (e.g., 06/30/04 = June 30, 2004).

Inspection Type: Use one of the codes listed below to describe the type of inspection:

A Performance Audit	L Enforcement Case Support	2 IU Sampling Inspection
B Compliance Biomonitoring	M Multimedia	3 IU Non-Sampling Inspection
C Compliance Evaluation (non-sampling)	P Pretreatment Compliance Inspection	4 IU Toxics Inspection
D Diagnostic	R Reconnaissance	5 IU Sampling Inspection with Pretreatment
E Corps of Engineers Inspection	S Compliance Sampling	6 IU Non-Sampling Inspection with pretreatment
F Pretreatment Follow-up	U IU Inspection with Pretreatment Audit	7 IU Toxics with Pretreatment
G Pretreatment Audit	X Toxics Inspection	
I Industrial User (IU) Inspection	Z Sludge	

Inspector Code: Use one of the codes listed below to describe the *lead agency* in the inspection:

C - Contractor or Other Inspectors (Specify in Remarks Columns)	N - NEIC Inspectors
E - Corps of Engineers	R - EPA Regional Inspector
J - Joint EPA/State Inspectors - EPA Lead	S - State Inspector
	T - Joint State/EPA Inspectors - State Lead

Facility Type: Use one of the choices below to describe the facility.

1 - Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.

2 - Industrial. Other than municipal, agricultural, and Federal facilities.

3 - Agricultural. Facilities classified with 1987 SIC 0111 to 0971.

4 - Federal. Facilities identified as Federal by the EPA Regional Office

Remarks: These columns are reserved for remarks.

Inspection Work Days.: Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, travel time and preparation time. This estimate does not require detailed documentation.

Facility Evaluation Rating: Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Quality Assurance Data Inspection. Enter Q if the inspection was conducted as follow-up on quality assurance sample results. Enter N otherwise.

Photos Taken: Yes or No

Samples Taken: Yes or No

Lead Ecology Inspector: Enter lead inspector's name

Section B: Facility Data

This section is self-explanatory except for: "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, and other updates to the record), e-mail addresses...; and "Ecology Staff On-Site", which may include staff names, titles, phone numbers, or e-mail addresses.

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary.

Section D: Summary of Findings/Comments

Support the findings, as necessary, in a narrative report. Use the headings given on the report form (staffing, back-up power) as appropriate. Reference a list of attachments, such as completed checklists, photos, lab reports, etc. Use extra sheets as necessary.