ROMAC INDUSTRIES, INC.
21919 – 20th Ave. SE, Suite 100
Bothell, WA 98021-4404

Hays fluid controls

Transmate
a Division of Romac Industries, Inc.

July 16, 2012

Water Quality Permit Coordinator
Department of Ecology
Northwest Regional Office
3190 160th Avenue SE
Bellevue, WA 98001-5452

Re: Application for a State Wastewater Discharge Permit

Dear Mr. Knutson:

Enclosed is Romac Industries, Inc, application for a State Wastewater Discharge permit for an e-coating system we are adding to our Sultan Facility. Also enclosed is a check for $250.00 for the permit fee, the State Environmental Protection Act checklist for the project, the Puget Sound Clean Air Agency's Exemption from NOC Requirements determination letter, and copies of the MSDS sheets and tech sheets for the project.

If you have any questions about the permit or any information enclosed please contact me at 425-951-6273 or *rick.hess@romac.com*.

Thank you,

RJ Hess

Richard J. Hess
Environmental Health and Safety Manager
Romac Industries, Inc

APPLICATION TO DISCHARGE INDUSTRIAL WASTEWATER TO A PUBLICLY-OWNED TREATMENT WORKS (POTW)

This application is for a wastewater 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 the Department of Ecology with information on pollutants in the waste stream, materials that may enter the waste stream, and the flow characteristics of the discharge.

Information previously submitted to Ecology that applies to this application should be referenced in the appropriate section. Ecology may request additional information to clarify the conditions of this discharge.

SECTION A. GENERAL INFORMATION

1. Applicant Name: Romac Industries

2. Facility Name: _____
(if different from Applicant)

3. Applicant Mail Address: 21919 20th Ave SE #100
Street

Bothell, WA 98021
City/State Zip

4. Facility Location Address: 125 South Sultan Basin Rd
(if different from 3 above) Street

Sultan, WA 98294
City/State Zip

5. Latitude/longitude of the facility: 6. UBI Number 179-018-717

47 ° 51 ' 46 " N 121 ° 47 ' 51 " W

7. Latitude/longitude of the point of discharge to the municipal collection system, if greater than 100 feet from facility location ____ ° ____ ' ____ " N ____ ° ____ ' ____ " W

8. Contact person:

Richard J Hess
Name

EHS Manager
Title

425-951-6273 425-951-6530
Telephone Number Fax Number

rick.hess@romac.com
E-Mail

FOR OFFICE USE ONLY	Check One:	New/Renewal ☐	Modification ☐
Date Application Received ____	Date Fee Paid ____	Application/ Permit No. ____	Date Application Accepted ____

9. 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: mid August

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.

Jim Larkin — Signature* | 7/18/12 — Date | Pres. — Title

Jim Larkin
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 within your organization, the application is to be signed by the person who makes budget decisions for this facility.

The Department of Ecology is an equal opportunity agency and does not discriminate on the basis of race, creed, color, disability, age, religion, national origin, sex, marital status, disabled veteran's status, Vietnam Era veteran's status or sexual orientation.

If you need this document in an alternate format, please contact the Water Quality Program at (360) 407-6400. If you are a person with a speech or hearing impairment, call 711, or 800-833-6388 for TTY.

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I would like to confirm that Tom Lochmann, Jr, has been delegated signature authority for submittals required by the State Wastewater Discharge Permit, such as monthly reports, for the Romac Industries facility located at 125 South Sultan Basin Road, Sultan, WA 98294.

Signature	Date	Title
	May 10 2012	SUP

Joshua Larkin
Printed Name

Signature of delegated employee	Date	Title or function at the facility
	May 15 2012	Lab Technician

Tom Lochmann Jr.
Printed Name

SECTION B. PRODUCT INFORMATION

1. Briefly describe all manufacturing processes and products, and/or commercial activities, at this facility. Provide the applicable Standard Industrial Classification (SIC) Code(s) for each activity (see *Standard Industrial Classification Manual,* 1987 ed.).

Description:

See attached Section B.1. Product Information

2. List raw materials and products used at his facility: For E-coat system only

Type	RAW MATERIALS	Quantity
Water		estimate 4000 gal to set up system, discharge estimate 150 gal/mo

Type	PRODUCTS	Quantity
PowerCron 6000CX		10 gal/yr
Chemfos 51HD		5320 lbs/yr
Calcium carbonate		unknown

Section B.1. Product Information

Romac's Sultan facility is a ductile iron foundry; SIC code 3321or NAICS code 331511. It produces ductile iron castings for both internal and external customers. Supporting activities, such as painting, drilling and tapping of certain ductile iron castings and shipping of finished castings also occur. The facility is divided into seven departments – pattern shop, molding, melting, finishing, cast, warehouse, and maintenance. Metal is melted in two 6-ton ABB coreless induction furnaces, which are run on electrical power. Charges, or the raw materials which are to be melted to create the ductile iron, are conveyed to the furnaces through one of two 12,000 lb vibratory hoppers. Material is moved to the hoppers by a 7.5 ton bridge crane. The molten iron metal is poured from the furnaces into a ladle where it is transferred to an autopour. From the autopour the molten iron is poured into molds, which produce the castings. Molds are created from patterns which are made in the pattern shop. The molds are made in one of two Disamatics or the Osborn molding machines. Cores for the molds are made by the Laempe core making machine.

After the casting is produced it moves to the Finishing department where any necessary grinding takes place. When Finishing is through with the castings they go to the Cast department where, depending on the casting type, they are painted with evironamel paint, drilled and tapped, or are sent to directly to the warehouse department. From there the castings are shipped to internal or external customers.

We are applying for a permit for State Wastewater Discharge Permit because we are adding an e-coating line. This system will produce waste water that will require discharge into the sanitary sewer. Electrocoating, or e-coating, is a process of coating parts for corrosion resistance. The process is expected to operate at 95-98% efficiency. It will be a batch process. The process begins with the parts to be e-coated loaded onto racks and then being pretreated by immersion in a tank containing a cleaner-coater solution containing low levels of iron-phosphate and other detergents. The cleaner-coating material is then rinsed off in the next bath containing city water, and then rinsed a second time in a de-ionized water bath. The parts will then be immersed into the electrode position tank. 480v of direct current electricity is then applied to the tank. The positively charged paint deposits on the grounded part. Once the part is insulated with paint, it is removed and the un-deposited paint is rinsed off in the following two de-ionized water tanks. The removed paint is reclaimed and returned to the electrode position tank. The parts then go to a curing oven where they will be heated to 350 degrees Fahrenheit for 20 minutes. After curing they will be boxed for transportation to the various in-house production departments that use them.

All tanks have a 750 gallon capacity and will be filled to about 75% of capacity, or between 550 and 600 gallons. Tanks will be covered when not in use. They are an assortment of stainless steel, mild steel, and polypropylene/fiberglass coated tanks. Secondary containment will be built around the tanks. A working platform for the operator will also be built.

The process is being adopted only for select parts. It is currently expected to be operated part time (less than 100 hours a month). Romac is planning to coat 634,344 square inches per year after the completion of the project. Installation of the process is planned to be completed by the end of July 2012. The paint product to be used, PowerCron 6000CX, coats 626 square feet per gallon. It is estimated that less than 10 gallons of paint will be used per year. This may vary depending on the efficiency of the system achieved. If the process proves cost effective it may expand in the future, with a corresponding increase in operating hours and materials used.

See Section C.4 for wastewater treatment information.

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
E-coat system (new)	E-coat wastewater	1	B

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.)*

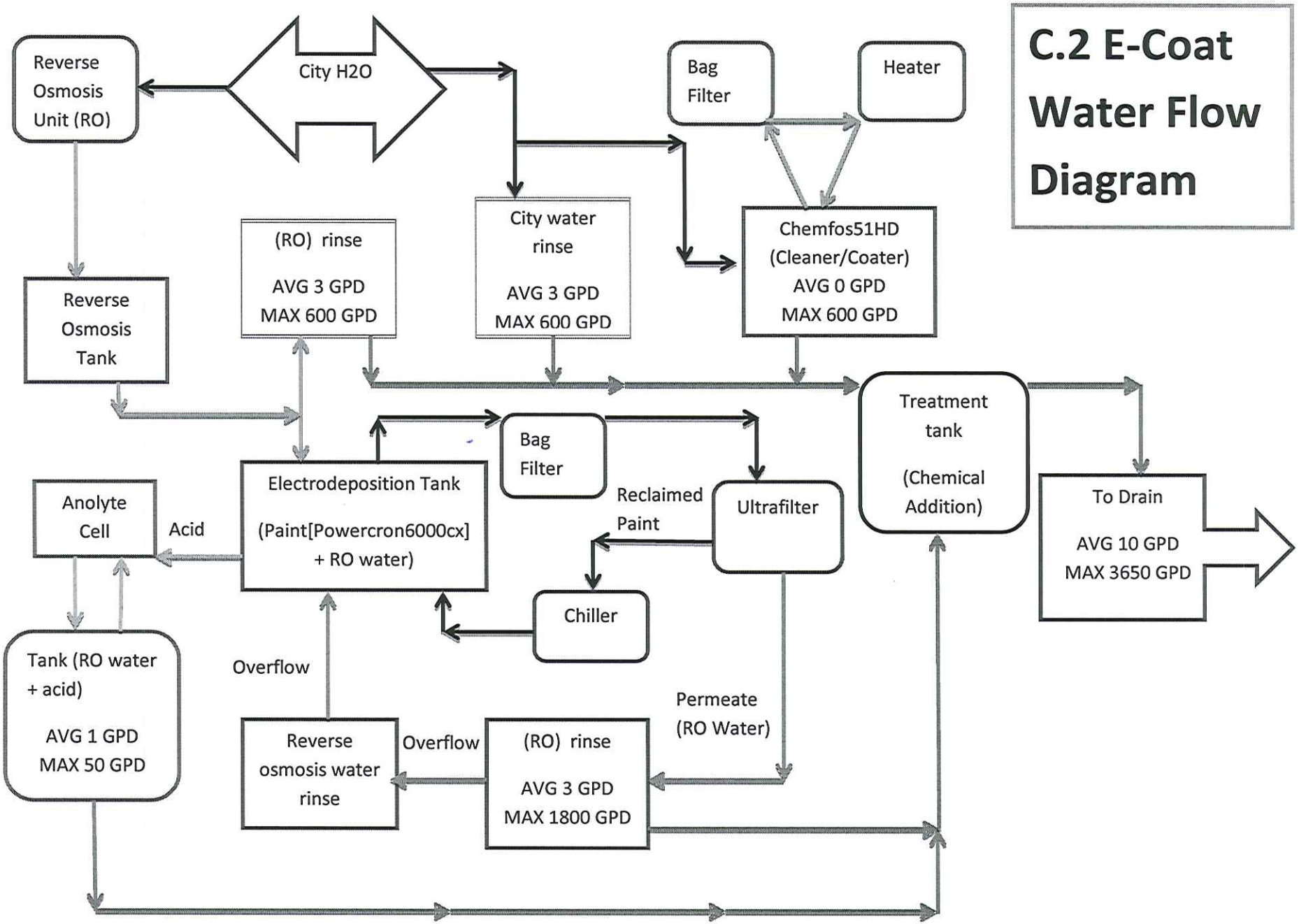
3. What is the maximum daily discharge flow 3650 gallons/day

   What is the maximum average monthly discharge flow (daily flows averaged over a month)? 10 gallons/day

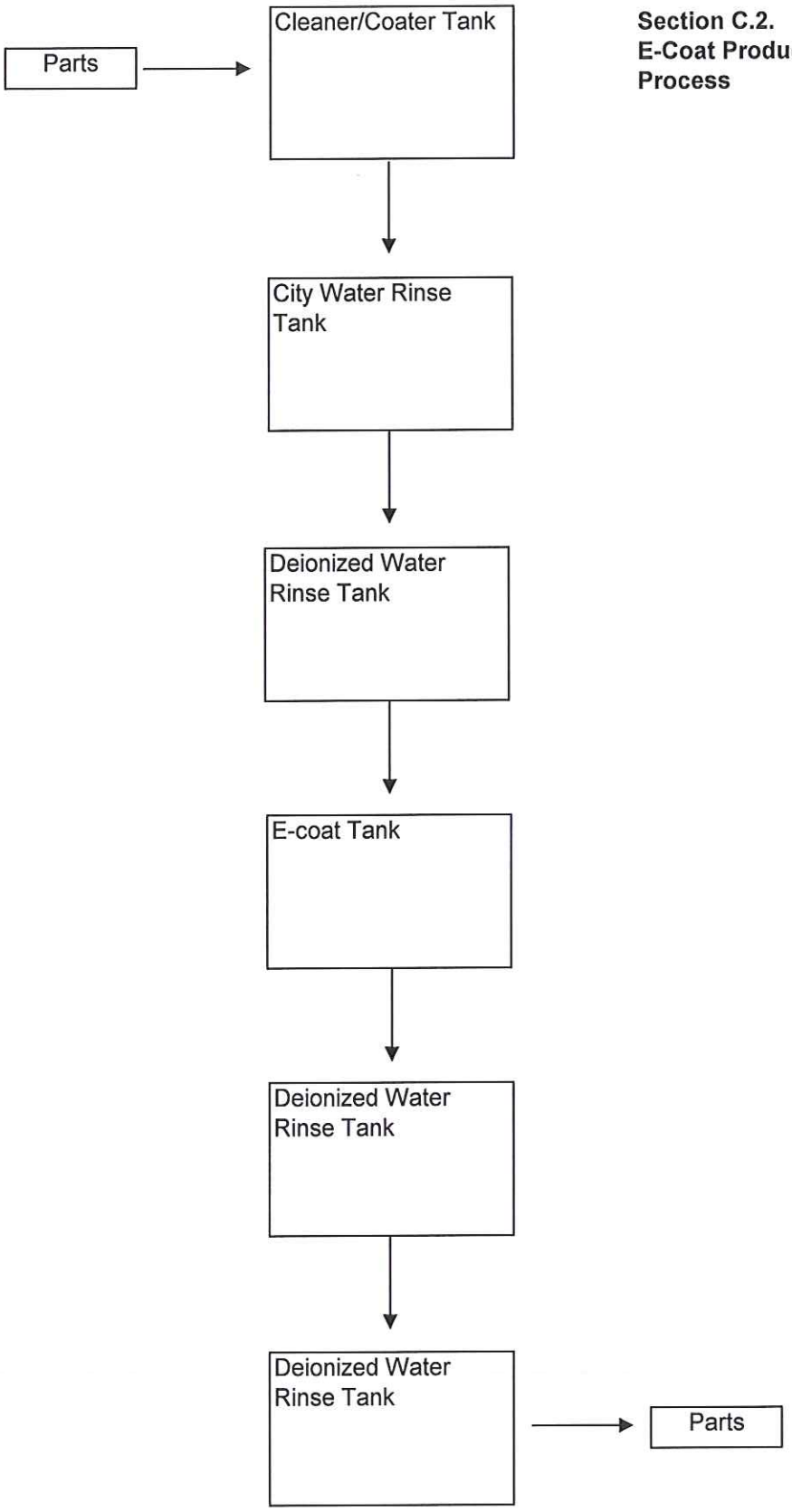
4. Describe any planned wastewater treatment improvements or changes in wastewater disposal methods, and the schedule for these improvements. *(Use additional sheets, if necessary and label as attachment C4.)*

See attachment C4.

C.2 E-Coat Water Flow Diagram



Section C.2.
E-Coat Production Process



Attachment Section C.4

Romac Industries Sultan Facility is adding an e-coating line. This system will produce waste water that will require discharge into the sanitary sewer. Wastewater quality and pH will be monitored and adjusted prior to disposal into the sanitary sewer. We anticipate that only the pH of the wastewater will have to be adjusted. Necessary treatment will be done in a 500 gallon portable tank with portable spill containment. There are two additional 500 gallon portable tanks, with portable berms, available to be set up and used if necessary. Emergency storage of wastewater can be done by the use of 325 gallon totes. Prior to discharge the pH of the wastewater will be checked and treated if necessary. The pH will be adjusted by the addition of calcium carbonate. Discharge into the sanitary sewer will be measured by a meter. We expect the initial average wastewater discharge to run 100 – 150 gallons per month. If the system proves successful average daily discharge could increase due to increased hours of operation. Maximum discharge would be less than 10,000 gallons a month. This 10,000 gallon estimate includes a worse case scenario of having to replace all of water in the system.

5. If production processes are subject to seasonal variations, provide the following information. List discharge for each waste stream in gallons per day (GPD). The combined value for each month should equal the estimated total monthly flow.

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? 10
   How many days a week does this facility typically operate? 5
   How many weeks per year does this facility typically operate? 52

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 this facility have:

   a. A Spill Prevention, Control, and Countermeasure Plan (40 CFR 112)? ☐ YES ☒ NO
   b. An Emergency Response Plan (per WAC 173-303-350)? ☐ YES ☒ NO
   c. A runoff, spillage, or leak control plan (per WAC 173-216-110(f))? ☐ YES ☒ NO
   d. Any spill or pollution prevention plan required by local, state or federal authorities? If yes, specify: _____ ☐ YES ☒ NO
   e. A Solid Waste Management Plan? ☐ YES ☒ NO
   f. A Slug Discharge Control Plan (40 CFR 403.8(f)(2)(v))? ☐ YES ☒ NO

Attachment C.7. Incidental Materials

Incidental Material	Gal
Paint, Black Envira Enamel	4841
Paint, Red Envira Enamel	1431
Paint, Yellow, Alkyd/Acrylic	2883
Shell Tellus Oil	88
Shell Omala 220 Oil	22
Shell Omala 150 Oil	22
Shell Tellus 46 Oil	22
Tellus Plus 32 Oil	55
Irus Du-Na 46 Oil	55
Tullus 46 Oil	55
Tonna 52 MX 68 Oil	55

SECTION D. WATER CONSUMPTION AND WATER LOSS

1. Water source(s):

☒ Public System (Specify) 847707 City of Sulton

☐ Private Well ☐ Surface Water

a. Water Right Permit Number: _____

b. Legal Description of Water Source:

_____¼S, _____¼E, _____, Section, _____TWN, _____R

2. Water use (Current use without E.coud system)

a. Indicate total water use: Gallons per day (average) 943

Gallons per day (maximum) 1216

b. Is water metered? ☒ YES ☐ NO

Attachment E.2. Wastewater Information

The e-coating of stainless steel fasteners will be a new process for Romac. Because the e-coating line is not currently in operation we have no discharge effluent to measure, and are unable to obtain the concentration levels of nickel, lead, silver, zinc, copper, cadmium or chromium as required by the permit application. Efforts to obtain metal concentration levels from our current vendors were unsuccessful. However, they wouldn't have been very helpful because we will only be e-coating stainless steel while our vendors e-coat other metals in addition to stainless steel. I was unable to find on the Internet information on an equivalent discharge that I could use. I discussed these problems with Mr. Doug Knutson, DOE, on June 1, 2012, and again on June 7, 2012. I explained to him that what I wanted to do is ask the manufactures of the part cleaning solution, PPG, to determine what level of heavy metals we could expect in the cleaning solution after exposure to the stainless steel fasteners. He agreed to look at that data and evaluate it to see if it meets the requirements of Section E.2.
PPG tested to determine the metal concentration in the CF51HD cleaning solution both before and after exposure to the stainless steel fasteners. The lab simulated the equivalent exposure of 588,708,000 fasteners in the bath for 1 minute. See attached "PPG Analytical Services Laboratory Report". We expect to do 1000 fasteners per cycle, or 8,000,000 fasteners per year. Time in the cleaning solution would be 1 minute per cycle. The after results were as follows:

Metal	ppm, mg/L
Ni	0.08
Pb	<0.10
Ag	<0.01
Zn	<0.005
Cu	0.10
Cd	<0.005
Cr	0.07

The pH of the discharge effluent will be adjusted to meet required City of Sultan and Department of Ecology discharge levels, prior to discharge into the sanitary sewer.

ANALYTICAL SERVICES LABORATORY REPORT

Industrial Pretreatment & Engineered Products - Euclid, OH

Project No. 12-1183

Account Name	Romac	**Submitted By**	D. Wilson
Account Location	Sultan, WA	**Send Copy To**	C. Spann, D. George
Date Received	6/19/12	**Date Completed**	7/9/12
Description	Heavy metal study	**Prepared by**	M. Wallman

Description of Work Requested:
Determine if various heavy metals are extracted from fasteners after CF51HD exposure.

Results/Comments:
Twelve 7/8" fasteners were exposed for 72 hours in a 0.2L bath of CF51HD at 60°C, this is the equivalent of 588,708,000 fasteners in a 600 gallon tank exposed for 1 minute.

The bath was analyzed by Inductively Coupled Plasma Optical Emission Spectrometry, ICP-OES, techniques for metals before and after exposure, Table 1.

Table 1, ICP-OES analysis

Metal	ppm, mg / L		ppm Increase in Total Metal Concentration
	Before	After	
Ni	< 0.02	0.08	0.06
Pb	< 0.10	< 0.10	ND
Ag	< 0.01	< 0.01	ND
Zn	< 0.005	< 0.005	ND
Cu	< 0.02	0.10	0.08
Cd	< 0.005	< 0.005	ND
Cr	0.07	0.07	ND

ND – not detected, no increase in metal concentration was detected.

The Analytical Services Laboratory is not a certified EPA laboratory. PPG Industries makes no warranty. The analyses have been performed in accordance with internally established laboratory practices.

Report Issued and E-mailed: 7/9/12 MLW

SECTION E. WASTEWATER INFORMATION

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

Intake: Water intake is measured at the meter going into the building

Effluent: Effluent is measured by a meter at its discharge point

2. 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. Use the analytical methods given in the table unless an alternate method is approved by Ecology. All analyses (except pH) must be conducted by a laboratory registered or accredited by the Department of Ecology (WAC 173-216-125). If this is an application for permit renewal, provide data for the last year for parameters that are routinely measured. For parameters measured only for this application, place the values under "Maximum." See attachment E-2

X	Parameter	Concentrations Measured Minimum	Maximum	Average	Analytical Method Std. Methods 19th edition	Detection Limit
	BOD (5 day)				5210	2 mg/l
	COD				5220 B, C, or D	5 mg/l
	Total Suspended Solids				2540D	1 mg/l
	Total Dissolved Solids				2540 C	
	Conductivity				2510 B	
	Ammonia-N				4500-NH_3 C	20 µg/l
X	pH	See	Attachment	E.2.	4500-H	0.1 units
	Total Residual Chlorine				4500-Cl E	1 mg/l
	Fecal Coliform				9222 D	
	Total Coliform				9221 B or 9222 B	
	Dissolved Oxygen				4500-O C or 4500-O G	
	Nitrate + Nitrite-N				4500-NO_3 E	0.5 mg/l
	Total Kjeldahl N				4500-N_{org}	20 µg/l
	Ortho-phosphate-P				4500-P E or 4500-P F	1 µg/l

X	Parameter	Concentrations Measured			Analytical Method Std. Methods 19th edition	Detection Limit
		Minimum	Maximum	Average		
	Total-phosphate-P				4500-P B.4.	1 µg/l
	Total Oil & Grease				5520 C	0.2 mg/l
	Total Petroleum Hydrocarbon				5520 D, F	
	Calcium				3500-Ca B	3 µg/l
	Chloride				4500-Cl C	0.15 µg/l
	Fluoride				4500-F D	0.1 mg/l
	Magnesium				3500-Mg B	0.5 µg/l
	Potassium				3500-K B	5 µg/l
	Sodium				3500-Na B	2 µg/l
	Sulfate				4500-SO_4 E	1 mg/l
	Arsenic (total)				3114 B	2 µg/l
	Barium (total)				3500-Ba B	30 µg/l
X	Cadmium (total)	See Attachment E.2			3500-Cd B	5 µg/l
X	Chromium (total)	See Attachment E.2			3500-Cr B	50 µg/l
X	Copper (total)	See Attachment E.2			3500-Cu B	20 µg/l
X	Lead (total)	See Attachment E.2			3500-Pb B	100 µg/l
	Mercury				3500-Hg B	0.2 µg/l
	Molybdenum (total)				3500-Mo	1 µg/l
X	Nickel (total)	See Attachment E.2.			3500-Ni	20 µg/l
	Selenium (total)				3500-Se C	2 µg/l
X	Silver (total)	See Attachment E.2.			3500-Ag B	10 µg/l
X	Zinc (total)	See Attachment E.2.			3500-Zn B	5 µg/l

3. Describe the collection method for the samples analyzed above (*i.e.*, grab, 24-hour composite).

grab sample from test bath

4. Has the effluent been analyzed for any other parameters than those identified in question E.2.?
☐ 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.)*

5. 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? (*The number following the chemical name is the Chemical Abstract Service (CAS) reference number to aid in identifying the compound.*) ☒ YES ☐ NO

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

Copper - used in making ductile iron; used 18,809 lbs during 2011
Incomag Alloy 1 (80% nickel) used in making ductile iron; used 5,379 lbs during 2011

VOLATILE COMPOUNDS

Acrolein (107-02-8)
Acrylonitrile (107-13-1)
Benzene (71-43-2)
Bis (*chloromethyl*) Ether (542-88-1)
Bromoform (75-25-2)
Carbon Tetrachloride (108-90-7)
Chlorobenzene (108-90-7)
Chlorodibromomethane (124-48-1)
Chloroethane (75-00-3)
2-Chloroethylvinyl Ether (110-75-8)
Chloroform (67-66-3)
Dichlorobromomethane (75-27-4)
Dichlorodifluoromethane (75-71-8)
1,1-Dichloroethane (75-34-3)
1,2-Dichloroethane (107-06-2)
Vinyl Chloride (75-01-4)
1,1-Dichloroethylene (75-35-4)
1,2-Dichloropropane (78-87-5)
1,3-Dichloropropene (542-75-6)
Ethylbenzene (100-41-4)
Methyl Bromide (74-83-9)
Methyl Chloride (74-87-3)
Methylene Chloride (75-09-2)
1,1,2,2-Tetrachloroethane (79-34-5)
Tetrachloroethylene (127-18-4)
Toluene (108-88-3)
1,2-Trans-Dichloroethylene (156-60-5)
2. 1,1,1-Trichloroethane (71-55-6)
2. 1,1,2-Trichloroethane (79-00-5)
2. Trichloroethylene (79-01-6)
Trichlorofluoromethane (75-69-4)

ACID COMPOUNDS

2-Chlorophenol 95-57-8
2,4-Dichlorophenol 120-83-2
2,4-Dimethylphenol 105-67-9
4,6-Dinitro-o-cresol 534-52-1
2,4-Dinitrophenol 51-28-5
2-Nitrophenol 88-75-5
4-Nitrophenol 100-02-7
p-Chloro-M-cresol 59-50-7
Pentachlorophenol 87-86-5
Phenol 108-95-2
2,4,6-Trichlorophenol 88-06-2

METALS

Antimony 7440-36-0
Arsenic 7440-38-2
Beryllium 7440-41-7
Cadmium 7440-43-9
Chromium 7440-47-3
Copper 7440-50-8
Lead 7439-92-1
Mercury 7439-97-6
Nickel 7440-02-0
Selenium 7782-49-2
Silver 7440-22-4
Thallium 7440-28-0
Zinc 7440-66-6
Cyanide 57-12-5

PESTICIDES

Aldrin 309-00-2
alpha-BHC 319-84-6
beta-BHC 319-85-7
gamma-BHC 58-89-9
delta-BHC 319-86-8
Chlordane 57-74-9
4,4'-DDD 72-54-8
4,4'-DDE 72-55-9
4,4'-DDT 50-29-3
Dieldrin 60-57-1
Endosulfan I 115-29-7
Endosulfan II 115-29-7
Endosulfan Sulfate 1031-07-8
Endrin 72-20-8
Endrin Aldehyde 7421-93-4
Heptachlor 76-44-8
Heptachlor Epoxide 1024-57-3
PCB (7 Aroclors)
Toxaphene 8001-35-2

BASE/NEUTRAL COMPOUNDS

Acenaphthene 83-32-9
Acenapthylene 208-96-8
Anthracene 120-12-7
Benzidine 92-87-5
Benzo(a)anthracene 56-55-3
Benzo(a)pyrene 50-32-8
3,4 Benzofluoranthene 205-99-2
Benzo(ghi)Perylene 191-24-2
Benzo(k)fluoranthene 207-08-9
Bis(2-chloroethoxy) Methane 111-91-1
Bis(2-chloroethyl) Ether 111-44-4
Bis(2-chloroisopropyl) Ether 102-60-1
Bis(2-ethylhexyl) Phthalate 117-81-7
4-Bromophenyl Phenyl Ether 101-55-3
Butyl Benzyl Phthalate 85-68-7
2-Chloronaphthalene 91-58-7
4-Chlorophenyl Phenyl Ether 7005-72-3
Chrysene 218-01-9
Dibenzo(a,h)anthracene 53-70-3
1,2-Dichlorobenzene 95-50-1
1,3-Dichlorobenzene 541-73-1
1,4-Dichlorobenzene 106-46-7
3,3- Dichlorobenzidine 91-94-1
Diethyl Phthalate 84-66-2
Dimethyl Phthalate 131-11-3
Di-n-butyl Phthalate 84-74-2
2,4-Dinitrotoluene 121-14-2
2,6-Dinitrotoluene 606-20-2
Di-n-octyl Phthalate 117-84-0
1,2-Diphenylhydrazine 122-66-7
Fluoranthene 206-44-0
Fluorene 86-73-7
Hexachlorobenzene 118-74-1
Hexachlorobutadiene 87-68-3
Hexachlorocyclopentadiene 77-47-4
Hexachloroethane 67-72-1
Indeno(1,2,3-cd)pyrene 193-39-5
Isophorone 78-59-1
Naphthalene 91-20-3
Nitrobenzene 98-95-3
N-nitrosodimethylamine 62-75-9
N-nitrosodi-n-propylamine 621-64-7
N-nitrosodiphenylamine 86-30-6
Phenanthrene 85-01-8
Pyrene 129-00-0
1,2,4-Trichlorobenzene 120-82-1

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

If yes, specify the material and quantity used:

_____

_____

7. 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):

_____

_____

_____

8. 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

9. If the answer to question 8 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

Ignitable ☐
Reactive ☐
Corrosive ☐
TCLP ☐ Dangerous Waste Number(s) _____

State Only Dangerous Wastes

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 (this may be combined with map in H8, if H8 is applicable to your facility.)
See attachment H8

SECTION G. OTHER PERMITS

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

WAD 089343982

SECTION H. STORMWATER

1. Do you have coverage under the Washington State Industrial Stormwater NPDES General Permit? ☐ YES ☒ NO
   If yes, list the permit number here._____

   If no, have you applied for a Washington State Stormwater Baseline 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)*

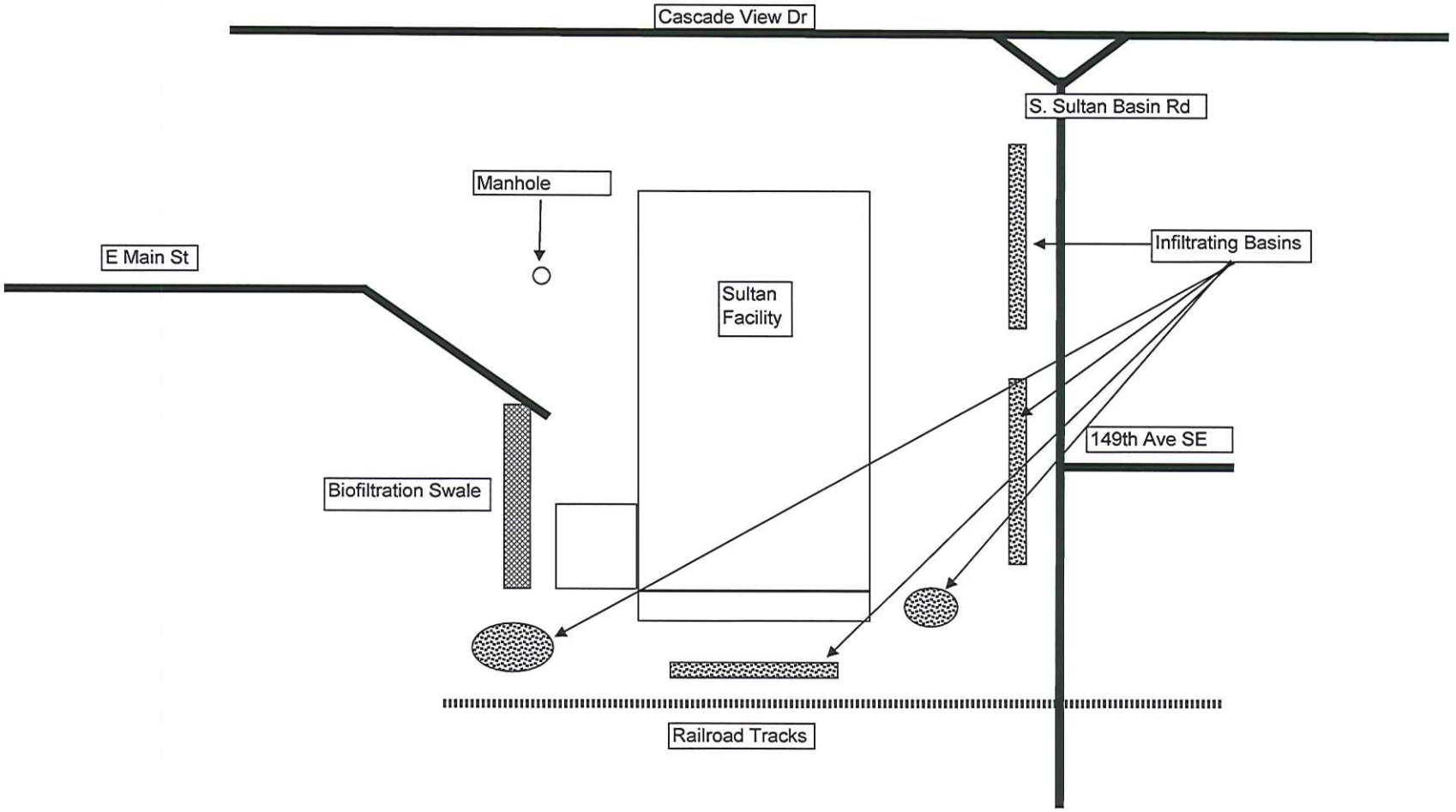
   - ☐ Solvents
   - ☒ Scrap Metal
   - ☒ Petroleum or Petrochemical Products
   - ☐ Plating Products
   - ☐ Pesticides
   - ☐ Hazardous Wastes
   - ☐ Acids or Alkalies
   - ☐ Paints/Coatings
   - ☐ Woodtreating Products
   - ☐ Other *(please list)*: _____

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

   - ☐ Oil/Water Separator
   - ☐ Containment
   - ☐ Spill Prevention
   - ☐ Surface Leachate Collection
   - ☐ Overhead Coverage
   - ☐ Detention Facilities
   - ☒ Infiltration Basins
   - ☐ Operational BMPs
   - ☐ Vegetation Management
   - ☒ Other *(please list)*: bioswale

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.8.*

Attachment H.5. Facility Map



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 coolant; used absorbents with spent coolant
Material is disposed of through:
Emerald Services, Inc.
7343 E. Marginal Way S.
Seattle, WA 98108 phone: 206-832-3000

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

Raw materials are stored inside the building except for scrap metal which is also stored outside
Products are stored inside the building
Wastes are stored inside the building.

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

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:

City of Sultan Waste Water Treatment Facility - WAO-023302
320 W Stevens Ave
Sultan, WA 98294

Treatment Works Owner: City of Sultan

Street: 319 Main St. Suite 200 / P.O. Box 1199

City/State: Sultan, WA Zip: 98294

Connie M. Dunn — Signature of Treatment Works Authority
5-30-2012 — Date
Public Works Field Supervisor — Title

Connie M. Dunn
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:

SAME AS ABOVE

Sewer System Owner:

Street:

City/State: Zip:

Signature of Sewer System Authority — Date — Title

Printed Name

City of Sultan

May30, 2012

Romac Industries
Sultan Foundry
123 S. Sultan Basin Road
Sultan, WA
21919 20th Avenue SE, Suite 100
Bothell, WA 98021

The City of Sultan has been working with Sultan Foundry Romac Industries regarding Pretreatment of the waste stream from the recently installed iron phosphate application, which they will be discharging to the City of Sultan Wastewater System and have applied for a Industrial Pretreatment National Discharge Elimination Permit for Industrial Pretreatment Facility.

Per WAC 173-216070(4)(b) Sultan Wastewater Treatment Facility certifies under penalty of law that the document being submitted to Department of Ecology and all attachments have been reviewed by Sultan Wastewater Treatment Staff and myself, Connie M. Dunn, City of Sultan Supervisor finding the statements correct.

The waste stream falls into the 40 CFR 403.6; Subsection N – National Pretreatment Standards under Categorical standards Part 433 Metal Finishing Point Source Category, 433.10 (a) (b); Part 438 –Metal Products and Machinery Point Source Category, 438.1 (a-Miscellaneous Metal Products) as defined in 438.2(f) processed wastewater discharges from oily and iron phosphate processes.

Sincerely,

Connie M. Dunn
City of Sultan
Public Works Supervisor

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 and40 CFR parts 405-471).

Summary of Attachments That May be Required for This Application:

(Please check those attachments that are included)

- ☒ C.1. Production schematic flow diagram and water balance
- ☒ C.4. Wastewater treatment improvements
- ☒ C.7. Additional incidental materials
- ☐ E.5. Additional results of effluent testing
- ☐ F.1. Facility site map
- ☒ H.5 Stormwater drainage map
- ☒ B.1. Product information
- ☒ E.2 Wastewater Information
- ☒ PPG Analytical Services Laboratory Report