

**S11. Slug Discharge Control Plan**  
**Slug Discharge Control Plan for Permit ST0045524**  
**Romac Industries, Sultan**  
**125 South Sultan Basin Road**  
**Sultan, WA 98294**

**Introduction:** A slug discharge is defined as a discharge of a non-routine, episodic nature to the POTW (Publically Owned Treatment Works). This includes spills or non-customary batch discharges. Romac Industries Sultan facility's Slug Discharge Control Plan is designed to minimize the potential of a slug discharge. This plan describes:

1. How a slug discharge is to be prevented;
2. How we discharge wastewater;
3. How a slug discharge would be reported to the Romac facility management;
4. How the appropriate Sultan POTW operator would be contacted;
5. How required state and local authorities will be contacted;
6. How the written follow-up report will be done.

**Prevention:** The potential of a slug discharge from the Sultan Facility is very remote. This is due to the procedures that have to be followed to discharge wastewater into the sanitary sewer. The discharge process is not automated, but is done manually. This insures that there are several checks and balances in the process. In addition, only authorized, trained personnel are allowed to discharge wastewater.

The most likely source of a slug discharge from the e-coat wastewater system would be the paint solution. To prevent this, the spent paint solution is only disposed of through a waste disposal company, currently Emerald Environmental Services.

**Discharge Process:** All discharges of wastewater must be processed manually. Wastewater that is to be discharged is collected into a 330 gallon tote. Prior to discharge it must first have its pH adjusted. This is done by the addition of sodium bicarbonate to the tote. Only the wastewater from this tote is discharged into the sanitary sewer system. The tote must then be transported to the discharge point. A pipe is connected between the tote and the discharge point. The discharge valve on the tote is opened and closed manually. The pH is continuously monitored during discharge. If at any point during the discharge process should the pH be out of compliance the discharge can be immediately stopped. The discharge point itself is elevated above ground level. Any spillage of liquid to the ground cannot get into the sanitary sewer. (Such spillage would be immediately cleaned up by trained personnel.) Only trained and authorized personnel are permitted to fill the tote, transport it, or discharge wastewater from it into the sanitary sewer. The discharge process is currently done by the e-coat supervisor.

**Internal Reporting of Slug Discharge:** In the event of a suspected or actual slug discharge into the sanitary sewer the following steps will be followed:

1. Any employee who becomes aware of a slug discharge will report it to the lead of the e-coat department immediately, currently Mike Armstrong. If the lead is unavailable the suspected discharge will be reported to the on site EHS Technician. This may result in more than one employee reporting a slug discharge; the important thing is that it gets reported as soon as possible.
2. The e-coat supervisor will report the slug discharge to the Sultan site Environmental Health and Safety Technician. This is currently Jennifer Downey. Her extension is 6493. If the EHS Technician

is not available the e-coat supervisor will report the suspected discharge to the Assistant Site Manager.

3. The EHS Technician will report the slug discharge to the Assistant Site Manager, Bob Gilmore, at extension 6479, and KC McNeil, Environmental Health and Safety manager, at extension 6212.

**External Reporting of Slug Discharge:** If the EHS Technician or Assistant Site Manager determines that an actual slug discharge has occurred it will be reported to external authorities as soon as possible.

1. The EHS Technician will contact the Sultan POTW. The contact is Brian Funk; the phone number is 425-508-9109.
2. The EHS Technician will contact the Washington State Department of Ecology at 425-649-7000.
3. If the EHS technician is not available the Assistant Site Manager will contact the external authorities.

**Investigation:** Any slug discharge will be investigated by the EHS Technician and the Environmental Health and Safety Manager. The investigation will determine the cause of the discharge, the quantity of material discharged, identify any process changes which may be required to prevent a reoccurrence, and examine the level of training of those employees involved in the slug discharge.

**Follow-up Report:** With the assistance of the Environmental Health and Safety Manager the Sultan Facility EHS Technician will submit to the Department of Ecology a written follow-up report of a slug discharge within five days.

**Operator Training, Equipment and Facilities for Preventing, Containing, or Treating Slug Discharges:** All operators will be trained to deal with slug discharges. The training will concentrate on prevention of a slug discharge by an emphasis on the steps to be followed prior to an authorized discharge, including the supervision of the discharge by the e-coat supervisor. In order to contain a slug discharge employees will be taught to shut off the discharge valve and disconnect the pipe from the sanitary sewer. Containment of any spillage will be done with the use of portable spill berms, and cleanup done with absorbent pads and socks. Spare totes are stored on site so as to be available for use to replace a leaking tote. Because wastewater is added to the tote over a one to two week period the discharge tote is stored inside the building in a bermed, confined area.

At present we have no way of treating a slug discharge once it has entered the sanitary sewer other than alerting the local POTW.

**Procedures to Prevent Adverse Impact from Accidental Spills:**

1. Storage areas are inspected at the start of each shift;
2. Berms are inspected daily;
3. All handling and transfer of material is done inside a bermed area;
4. The e-coat system has been constructed within containment to prevent any escaped of liquid;
5. No toxic organic pollutants, including solvents, are used in the process;
6. Portable berms, absorbents and spare totes are maintained in the area for the control and cleanup of any spills.

**Raw Materials, Products, Chemicals, and Hazardous Materials Used, Processed, or Stored at this Facility:** A list of raw materials, products, chemicals, and hazardous materials used, processed, or stored at this facility, the normal quantity maintained and a map showing where they are located can be found in the Tier II plan for this site.

**Raw Materials, Products, Chemicals, and Hazardous Materials Used, Processed, or Stored in the E-coat Area:** The following raw materials, products, chemicals, and hazardous materials are located in the e-coat area. All materials are stored inside the bermed, containment area. No toxic organics pollutants or solvents are stored or used in this area.

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|-------------------------|------------|
| 1. CF51HD               | 55 gallons |
| 2. Chemfil Buffer       | 5 gallons  |
| 3. ED Additive SA       | 5 gallons  |
| 4. PowerCron Additive   | 5 gallons  |
| 5. PowerCron Black Feed | 55 gallons |
| 6. PowerCron Resin      | 55 gallons |
| 7. Sodium Bicarbonate   | 50 pounds  |
| 8. PPG MZD 7330 Biocide | 5 gallons  |
| 9. PPG Prep 225 Cleaner | 5 gallons  |

**Unauthorized Discharges:** There have been no unauthorized discharges.