



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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TECHNICAL MEMORANDUM

To: Andrea Jedel (Ecology WQ-CRO-Industrial Unit)

From: Will Moseley (Ecology SWRO-WQP)

Through: John Diamant, P.E. (Ecology SWRO-WQP)

cc: Matthew Durkee, L.H.G. (Ecology CRO-WQP)

Date: March 25, 2025

Re: Comments for Desert Wind Winery (ST0009272) Submittals: Operations and Maintenance Manual, Solid Waste Control Plan, Spill Control Plan, and Slug Discharge Control Plan

Andrea,

I've reviewed the above referenced submittals for compliance with WAC 173-240-150 and permit sections S4, S7, S10, and S11. My full comments are on the following pages, but in summary, the submittals are compliant except for the following deficiencies:

- O&M Manual
 - Missing names and phone numbers of responsible individuals, and emergency plans and procedures
- Solid Waste Control Plan
 - Missing facility name and address, as well as the wastewater permit number
- Spill Control Plan
 - Missing full inventory of potentially hazardous materials onsite, operator training information, facility drainage map, and contact information for the POTW
- Slug Discharge Control Plan
 - Included as part of the Spill Control Plan in title, but none of the requirements of S11 are met

WAC 173-240-150 Operation and maintenance manual.

- (1) A detailed operation and maintenance manual must be prepared for an industrial wastewater facility that includes mechanical components before completing the construction. The manual is to be submitted to the department for review and approval. The purpose of the manual is to present technical guidance and regulatory requirements to the operator to enhance operation under both normal and emergency conditions.
- (2) The operation and maintenance manual shall include the following topics:
 - (a) The names and phone numbers of the responsible individuals.
 - i. Please add the names and phone numbers of both responsible individuals onsite, and with the City of Prosser.
 - (b) A description of plant type, flow pattern, operation, and efficiency expected.
 - i. Not applicable, wastewater from this facility is treated by City of Prosser POTW.
 - (c) The principal design criteria.
 - i. Not applicable, wastewater from this facility is treated by City of Prosser POTW.
 - (d) A process description of each plant unit, that includes function, relationship to other plant units, and schematic diagrams.
 - i. Not applicable, wastewater from this facility is treated by City of Prosser POTW.
 - (e) An explanation of the operational objectives for the various wastewater parameters, such as sludge age, settleability, etc.
 - i. Not applicable, wastewater from this facility is treated by City of Prosser POTW.
 - (f) A discussion of the detailed operation of each unit and a description of various controls, recommended settings, fail-safe features, etc.
 - i. Not applicable, wastewater from this facility is treated by City of Prosser POTW.
 - (g) A discussion of how the facilities are to be operated during anticipated startups and shutdowns, maintenance procedures, and less than design loading conditions, so as to maintain efficient treatment.
 - i. Not applicable, wastewater from this facility is treated by City of Prosser POTW.
 - (h) A section on laboratory procedures that includes sampling techniques, monitoring requirements, and sample analysis.
 - i. Section 5: Wastewater Sampling
 - (i) Recordkeeping procedures and sample forms to be used.
 - i. Section 5: Wastewater Sampling
 - (j) A maintenance schedule that incorporates manufacturer's recommendations, preventative maintenance and housekeeping schedules, and special tools and equipment usage.
 - i. Section 6: Maintenance
 - (k) A section on safety.
 - i. Section 7: Safety
 - (l) A section that contains the spare parts inventory, address of local suppliers, equipment warranties, and appropriate equipment catalogues.
 - i. Not Applicable
 - (m) Emergency plans and procedures.
 - i. Please include a discussion of emergency plans and procedures, or refer to other submitted contingency plans

S7.C.b. Solid waste control plan content

The solid waste control plan must:

1. Follow Ecology's guidance for preparing a solid waste control plan (<https://fortress.wa.gov/ecy/publications/SummaryPages/0710024.tml>) and address all solid wastes generated by the permittee.
2. Include at a minimum a description, source, generation rate, and disposal methods of these solid wastes.
3. Not conflict with local or state solid waste regulations.

Developing a Solid Waste Control Plan - Basic Elements of a Solid Waste Control Plan

1. Name and address of facility generating solid waste.
a. **Not included**
2. Wastewater Discharge permit number
a. **Not included**
3. Name, phone number, email (optional), and title for the facility's primary contact person.
a. **Included**
4. A list and estimated annual volume of each type of solid waste generated by the facility.
a. **Included**
5. A list of any solid waste permits issued for on-site management of solid waste.
a. **Not Applicable**
6. Description of methods of treatment/handling/disposal for each type of solid waste.
a. **Included**
7. Description of any contingency plans for solid waste handling.
a. **Included**
8. Name and contact information for each facility receiving your solid waste.
a. **Included**

S10.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.
 - a. Page 1: "Inventory of potential material not in a locked storage room: between one and six 50lb sealed bags of caustic soda, one partial 50lb bag of caustic soda that has been opened." Please include all products and materials onsite that meet the above definition, regardless of where they are stored.
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.
 - a. Please include a facility drainage map, including slope directions, any sumps, and spill kits. Please include discussion on a spill scenario including spilled wine or other product.
3. A description of the reporting system the Permittee will use to alert responsible managers and legal authorities in the event of a spill.
 - a. Page 1 contains various spill scenarios and which agencies to report them to. Please add contact information for the POTW operator.
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.
 - a. Page 1: "Cellar Workers are supervised to ensure safe practices, and trained by either the Cellar Master or Assistant Winemaker. For operational or training information, contact the Cellar Master at 509-786-7277." Please include a description of how and how often employees are trained on site contingency plans.

S11. Slug discharge control plan

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.
a. Not included
2. A description of operator training, equipment, and facilities (including overall facility plan) for preventing, containing, or treating slug discharges.
a. Not included
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.
a. Not included
5. A description of discharge practices for batch and continuous processes under normal and non-routine circumstances.
a. Not included
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.
a. Not included
7. An implementation schedule including additional operator training and procurement and installation of equipment or facilities required to properly implement the plan.
a. Not included

Nothing in the Spill Plan and Slug Discharge Control Plan is specifically for slug discharges