

	<b>PRC-E-007 Slug Discharge Control Plan</b>	<b>Revision: 006/03.2025</b>
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# PRC-E-007 SLUG DISCHARGE CONTROL PLAN

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## 1.0 Purpose

The purpose of this document is to minimize the potential of non-routine, non-customary batch discharges to the City of Moses Lake Larson Publicly Owned Treatment Works (POTW) and to the Port of Moses Lake water treatment system (POML).

## 2.0 Scope

This procedure applies to all discharges to the industrial and sanitary sewer system at the Moses Lake facility.

## 3.0 References

State Waste Discharge Permit Number ST-0501273.

## 4.0 Responsibilities

The Emergency Coordinator has primary responsibility for response to emergencies. Supervisors should ensure that team members are familiar with these procedures. Furthermore, all team members should follow these procedures in the event of slug discharge. It is the Emergency Coordinator's responsibility to ensure effective implementation of this procedure.

## 5.0 Slug Discharge Control Plan Components

Special Condition 12 of the discharge permit ST-0501273 requires that the following information and procedures relating to the prevention of unauthorized slug discharges be included in the slug discharge control plan.

1. In the event of a hazardous material incident that results in an unpermitted release into the domestic or industrial sewers, the team member who discovers the release must immediately report it to the supervisor in charge and the supervisor in charge will notify the Health, Safety, Environmental Department. The HSE Department will notify the appropriate agencies:

<b>Department of Ecology (business hours):</b>	<b>509-329-3500</b>
<b>Department of Ecology (24 hrs)</b>	<b>509-329-3400</b>
<b>Sewer discharge (POTW)</b>	<b>509-764-3951</b>
<b>Industrial discharge (POML)</b>	<b>509-762-5054</b>

The supervisor in charge will fill out an incident report in the Compliance Management System as soon as possible, but no later than 8 hrs from the time of discovery of the incident. The Environmental Engineer will send a written report to DOE and POML or POTW (as applicable) within 5 days of the incident. The report will include an analysis of the cause of the release and corrective actions to reduce the risk of the incident re-occurring.

2. The company industrial waste water includes but is not limited to reverse osmosis reject water, periodic discharges from bicarbonate rinse baths, boiler blow downs, and onsite nitrogen plants' condensate. All the waste water created at the company is either discharged to the

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POTW or to the POML using separate pipelines. The facility's domestic waste water from the office and the production buildings gravitationally flows to the domestic sewer lift station at the SE corner of the property before being discharged into the POTW system. The company's process building floor drains and industrial waste water gravitationally flow towards the south, into a wet well, Manhole#14, before it is discharged to the POML's lift station. Figure.1 shows the waste water flow diagram. There is no waste water treatment or storage capacity at the facility.

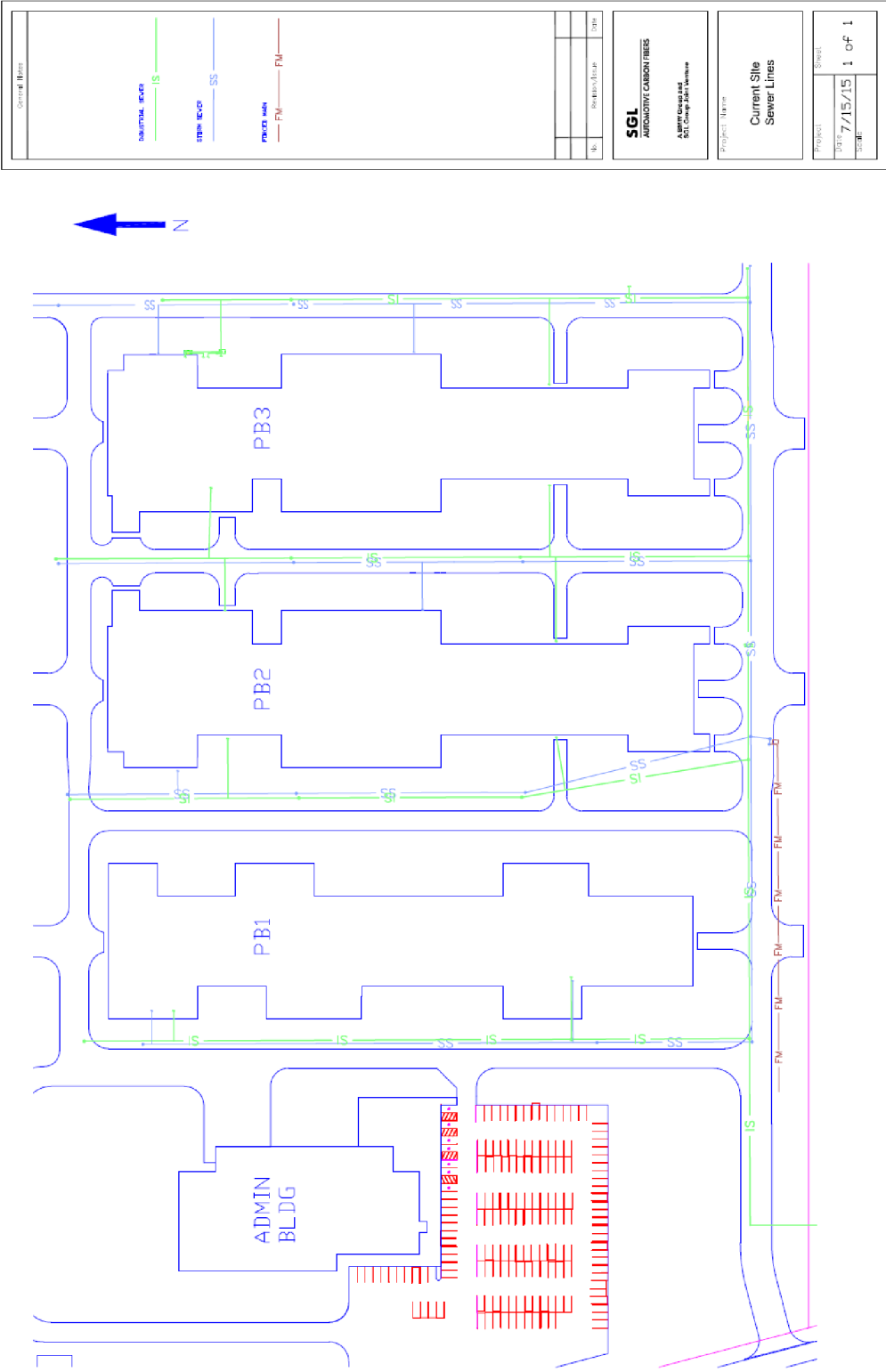
Chemicals or raw materials are stored inside buildings or under cover. All storm water at the facility flows into dry wells that are staggered throughout the facility. The dry wells prohibit any storm water runoff from the site.

All team members will be trained at hire and annually thereafter on the spill control plan and slug discharge plan. Also, each team member will participate in relevant training before operating company equipment.

**3.** To prevent adverse impacts from accidental spills, the following procedures will be implemented.

- a.** Equipment and hazardous substance storage areas will be periodically inspected to ensure leaks or spills are not occurring
- b.** Hazardous substances in the facility will be properly stored, dispensed, and/or used in a way that prevents release.
  - Hazardous substance containers will be in good condition and compatible with the materials stored within.
  - Open container use of hazardous chemicals near sinks and floor drains will be avoided.
  - If open container use of chemicals near floor drains is unavoidable, the floor drains will be plugged.
  - Chemicals will be stored on pallets, in cabinets, or on secondary containment.
  - To minimize the storage quantities, hazardous chemicals will be ordered as needed.
  - Unwanted chemicals and hazardous waste will be properly disposed of.
- c.** Any slug discharge that may occur at the shipping and receiving docks that flows into to the dry well will be cleaned properly.
- d.** Plant site storm water is collected in the dry wells that are located within the property.
- e.** Chemicals will be stored inside the buildings or under cover.
- f.** Solvent absorbent pads will be kept in the laboratory where solvents are used.
- g.** Spill kit materials and overpack/salvage drums will be kept on hand for quick response to contain any leaked material.

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Figure.1 waste water flow diagram

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4. The facility processes polyacrylonitrile to produce automotive carbon fibers. Epoxy and ammonium bicarbonate solutions are used during this process. The off gasses that are created during the carbon fiber manufacturing process are governed by the facility air approval order. Other chemicals are stored and used throughout the plant for production, maintenance, laboratory, and other necessary operations. An inventory of all chemicals that are used, stored, and produced at the Moses Lake facility is maintained on an online SDS repository. Team members have 24/7 access to the SDSs. See Table.1 for a list of normal quantities of chemicals maintained on the premises. Figure.2 shows a facility map indicating the storage and usage locations of each chemical found in Table.1.

5. Batch discharges might occur due to plant shutdown, equipment failure or maintenance operations. Under normal operating conditions the facility is expected to discharge an average of up to 135,000 gallons of industrial waste water per day, based on operation of six lines, into the POML.

Table.1 List and quantities of raw materials and chemicals kept on site at Moses Lake

Type	Quantity (On Site)
Ammonium Bicarbonate	180,000 lbs
Anhydrous Ammonia	667 gallons
Polyacrylonitrile Precursor	800,000 lbs
Duroxyn SEF 968	80,000 lbs
Antichlor 30	90 gallons
Vitec 3000	20 gallons
Acetone	30 gallons
Ethanol	8 gallons
All in One BT	400 liters
Caustic	400 liters
Powdered Sulfite	400 liters
Vitec 4000	180 gallons
Bio Power 524	20 gallons
Antichlor 427	110 gallons
Safe-T-Therm heat transfer fluid	440 gallons
909 Cooling Tower Biocide	40 gallons
CTT 20S	40 gallons
Note: values are for 4 production lines	

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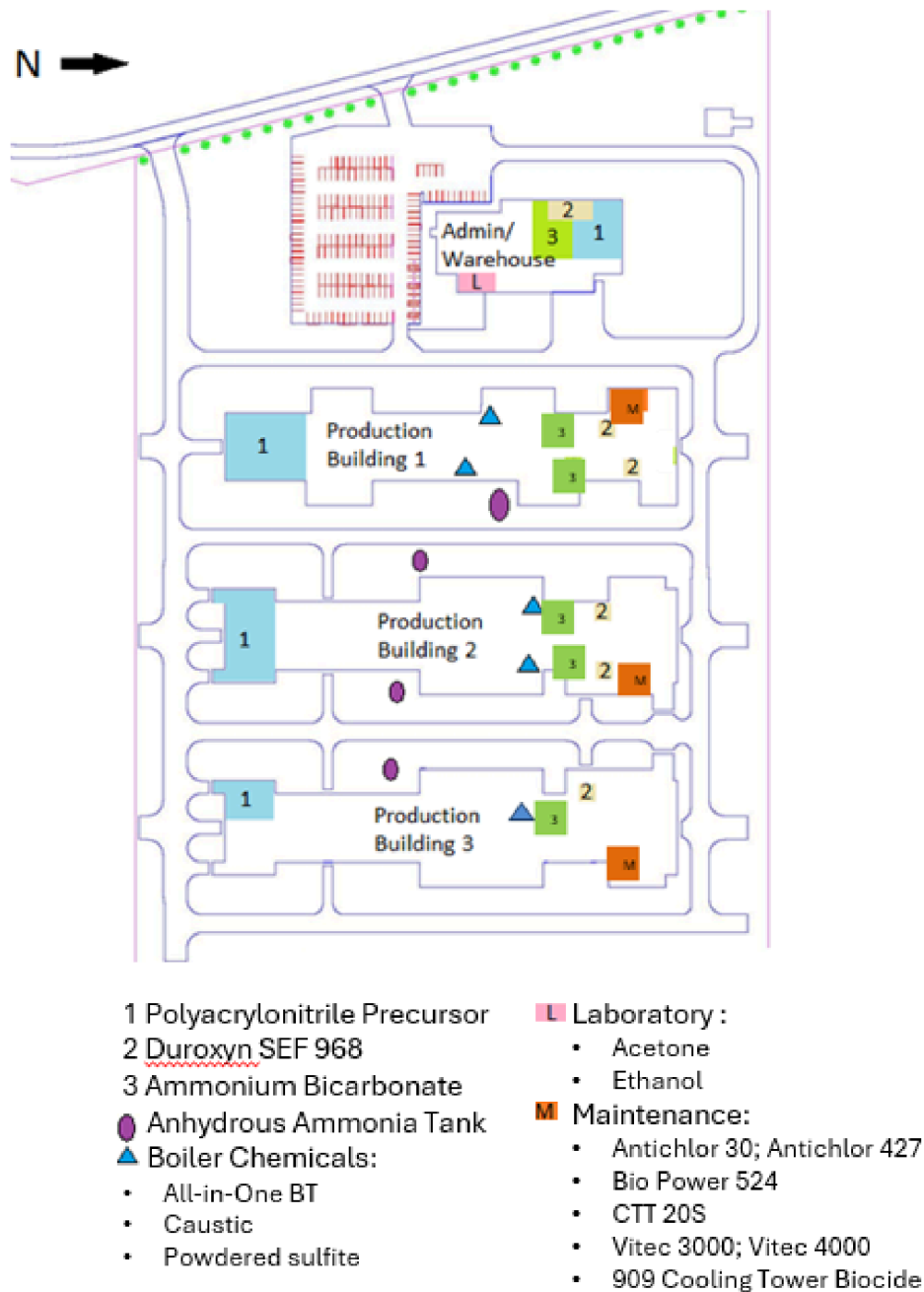


Figure.2 Locations of hazardous material storage and usage areas throughout the Moses Lake facility

### 6.0 Reporting and Recordkeeping

All slug discharge incidents that effect the POML or POTW systems will be reported to the DOE and either POML or POTW, and followed up with a written report within 5 days of the incident. If a spill poses a threat to human health or the environment, the

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Emergency Coordinator must immediately report it to 911. All slug discharge incident reports will be kept in the Compliance Management System. Team member training records are kept in the Human Resources Team Member Training binder, online on the Compliance Management System, in the Production training folder, or in the Safety training folder.

All records of procurement activities governed by this procedure shall be handled in accordance with **Quality Records**, IMS-Q-003, for storage and retention. This procedure should be handled in accordance with **Document Control**, IMS-Q-002.

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