



Slug Discharge Control Plan

Pacific Seafood – Woodland, LLC
1635 Down River Drive
Woodland, Washington 98674

January 2025

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Version 1.2

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1. INTRODUCTION

This Slug Discharge Control Plan (Plan) has been prepared for Pacific Seafood – Woodland, LLC (Pacific Seafood) in accordance with the National Pollutant Discharge Elimination System (NPDES) Waste Discharge Permit Number ST0006222.

The intention of this Plan is to establish the procedures and equipment required to minimize the potential of unauthorized slug discharges from the facility to the publicly owned treatment works (POTW). The Plan also establishes the procedures required report such discharges, should they occur, to the appropriate internal personnel and external federal, state, and local agencies. As defined in Chapter 40 of the Code of Federal Regulations (CFR), Part 403.8(f)(2)(vi), "...a Slug Discharge is any Discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch Discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, local limits or Permit conditions."

1.1 GENERAL FACILITY INFORMATION

This Plan has been developed and certified for the following facility:

Owner:	Dulcich, Inc.
Facility Name:	Pacific Seafood – Woodland, LLC (Site)
Facility Address:	1635 Down River Drive
City and State:	Woodland, WA
Facility Telephone Number	(360) 225-8553
Facility SIC Code:	2092
Acting General Manager:	James Bond
Telephone Number:	(503) 905-4565
Production Supervisor:	Lee Lopez
Telephone Number:	(360) 225-8553

1.2 GENERAL PLAN REVIEW AND AMENDMENT

Pacific Seafood will review and evaluate this Plan at least annually and modify the Plan, as needed. Modifications to this Plan will include any changes to facility design, construction, operation, or maintenance that materially affects the potential for a slug discharge to the POTW. Pacific Seafood will submit the revised Plan to the Department of Ecology (Ecology) for review and approval.

1.3 IMPLEMENTATION

This Plan shall be maintained on-site and made readily available to Pacific Seafood personnel.

2. PLAN REQUIREMENTS

2.1 REPORTING SLUG DISCHARGES

Pacific Seafood must immediately notify facility management, the POTW operator, and appropriate federal, state, and local authorities if a slug discharge occurs or is expected to occur. Five days following the slug discharge, a written follow-up must be submitted to the Department of Ecology (Ecology).

2.1.1 WHAT TO REPORT

Prior to notifying the appropriate parties, gather as much information as possible about the slug discharge to relay to authorities. Specifically identify and report:

- Date of incident;
- Time frame of incident (i.e., start and stop time or anticipated stop time);
- Composition of slug discharge (e.g., oil, specific chemical, etc.);
- Approximate volume of slug discharge;
- Cause of incident;
- Potential impacts to human health, environmental health, or property;
- Names of personnel involved or witness to the incident;
- List of authorities already notified or planned to be notified;
- Details of any emergency response provided;
- Actions taken to stop slug discharge; and
- Corrective action planned or implemented to prevent reoccurrence.

2.2.2 INTERNAL NOTIFICATION CONTACTS

Pacific Seafood must immediately notify the following internal personnel upon learning that a slug discharge has occurred or may occur:

- Facility management:
 - James Bond, Acting General Manager, (503) 327-6675
 - Lee Lopez, Production Manager, (360) 749-6869
 - Danny Howard, Maintenance Manager, (360) 210-6249
- Corporate management:
 - Dan Occhipinti, Chief Strategy Officer, (503) 400-2760
 - Amy Wentworth, Sr. Director of EHS & Facilities Maintenance, (503) 298-3511
 - Ben Mitchell, Environmental Manager, (503) 905-4264

2.2.3 EXTERNAL NOTIFICATION CONTACTS

Pacific Seafood must immediately notify Ecology and the City of Woodland POTW upon learning that a slug discharge has occurred or may occur.

- Department of Ecology, Southwest Regional Office
 - Sepideh Sadeghi, Permit Manager, Sepideh.sadeghi@ecy.wa.gov
 - Gayle Garbush, Industrial Permit Administrator, (360) 706-4191
- City of Woodland POTW
 - Derrek Amburgey, Treatment Plant Superintendent, (360) 225-7007, amburgeyd@ci.woodland.wa.us
 - After Hours Phone Number, (360) 608-8722

If the impacts of the slug discharge could result in danger to human health and safety, environmental harm, or damage to property, notify the appropriate agencies below:

- 911 emergency responders
- National Response Center, 888-424-8802
- Clark County Non-Emergency Dispatch, (360) 225-8981 or (360) 577-3098

2.2 MATERIAL INVENTORY AND STORAGE

Pacific Seafood process frozen, raw seafood on-site. No chemicals or additives are used in the production of seafood product. All chemicals and petroleum products used and stored on-site are for cleaning or maintenance purposes.

Cleaning and sanitation chemicals are chlorine-based or ammonia-based and are diluted with water prior to use in production areas. Pacific Seafood typically stores between five and ten 55-gal drums of concentrated sanitation chemicals at any given time. Occasionally, more than ten drums may be on-site temporarily if usage rates decline unexpectedly. Drums are stored in designated, secure chemical storage areas indoors and kept on secondary containment at all times. Chemical storage areas are inspected at least monthly. In production areas, all cleaning and sanitation chemicals are diluted and typically kept in 5-gallon containers or smaller while in use.

All other liquid or solid chemicals, petroleum products and solvents are kept in small containers; typically in volumes of 1-gallon or less in the maintenance department. Fuel is not stored on-site with the exception of propane. Oils are stored in small volumes (<1 gallon).

2.3 Material Handling

All processing activities, loading, and material handling operations are conducted entirely indoors at this facility. This indoor containment ensures that there is no exposure to precipitation or potential for contaminated runoff, thereby minimizing the risk of accidental discharges or illicit connections to the City of Woodland. By confining these activities within the building, the facility maintains controlled conditions that nearly eliminates the chance of runoff events.

2.4 SPILL CONTROL AND PREVENTION

2.4.1 GENERAL DISCHARGES AND SOLID WASTE

Pacific Seafood handles and disposes of all solid waste material in a manner as to prevent its entry into state ground and surface water. Solid waste materials generated at the site are limited to

municipal solid waste and recyclables. Wastewater generated at the site includes process wastewater and domestic sewage.

Municipal and recyclable waste is managed through local municipal waste service providers. Dumpsters and containers capable of storing such waste are used to collect materials prior to disposal to solid waste landfills and/or recycling facilities. Lids are kept closed on dumpsters and collection containers unless actively in use. Dumpsters are located outside and are kept under cover. If containers are damaged or are not functioning properly, they are immediately repaired or replaced. Dumpsters are inspected visually weekly for signs of any leachate and promptly remediated, if any leachate is observed.

Routine maintenance, including any oil changes, are contracted out by third parties. Equipment that contains petroleum-based oil are inspected daily for signs of leaks and, if found, the equipment is removed from operations and scheduled for repair. When not in use, forklifts and other mobile equipment are stored under cover. All repairs and maintenance to equipment that contain petroleum-based oils are conducted under cover and with use of trays and/or spill pads to prevent oil from leaching into waterways.

Secondary containment structures are kept substantially empty (i.e., there is sufficient capacity in the secondary containment structure to hold the intended chemical storage, plus sufficient freeboard for precipitation containment if outside exposed to the elements). Employees receive annual training for proper solid waste handling and spill prevention.

2.4.2 Facility Discharge Practices

Process wastewater is screened through a hydrosieve and stored in one of two equalizer (EQ) tanks on the north side of the Facility prior to conducting batch discharge events during normal operations. Routine batch discharges are conveyed to the City of Woodland's public wastewater treatment plant following treatment. The volumes of all batch discharges are metered at all times to maintain NPDES permit compliance and discharge flow rates are controlled to comply with permit limits.

When the facility is undergoing all processing and sanitation related activities, wastewater is conveyed through wastewater drains inside processing areas. All drains are then routed to a final sump, just prior to being pumped through the rotary screen. The pump located in the sump prior to the rotary screen is operated by float switches. As untreated wastewater is pumped into the rotary screen, any solids or other particles are caught in the screen and collected into totes. These solids are properly disposed of in covered waste containers at the facility. All water thereafter is treated, routed, and stored in the two equalization tanks. When the EQ tanks become full, float sensors are triggered which allows the pumps to discharge treated effluent through the flow meter, and to the City's wastewater conveyance system.

There are not any anticipated non-routine batch discharges that occur at this facility. With the current layout of the conveyance system, all wastewater is routed to a single sump prior to being pumped to the rotary screen, and then to the equalization tanks. All water that is capable of being discharged from the Facility to the City therefore can only come from water in the equalization tanks, which consists of treated wastewater.

If ever a spill or other illicit material were to enter wastewater drains inside production areas of the Facility which could lead to a SLUG discharge, the Facility would take immediate action to ensure that that material is contained to the conveyance system on site and would attempt to hold the material onsite until the City is contacted and made aware of the situation. If this were to occur, it could be possible to hold any material in the EQ tanks, and to pump the illicit or concentrated material into a tanker to be properly disposed of if the City was unable to handle the material.

2.4.3 SPILL RESPONSE AND REPORTING

If material is released outside of containment areas, it is critical that the material is accurately identified and appropriate control measures are taken in the safest possible manner. Consult the safety data sheet (SDS) of the spilled material.

The person discovering a release of material from a container, operating equipment, or other source must initiate the following immediately:

1. **Extinguish any sources of ignition.** Until the material is identified as nonflammable and noncombustible, all potential sources of ignition in the area should be removed or disabled, including motorized vehicles and equipment. If the ignition source is stationary, attempt to move spilled material away from ignition source. Avoid sparks and movement creating static electricity.
2. **Attempt to stop the release at its source.** First, verify that no danger to human health exists first. Simple procedures (turning valves, plugging leaks, etc.) may be attempted by the person who discovers the release/spill if there is no health or safety hazard and there is a reasonable certainty of the origin of the leak. Following proper safety procedures, the spill should be contained using absorbent materials, booms, dikes, shovels, and brooms. Stormwater and wastewater inlets should be protected to prevent migration to waterways or the sanitary sewer.

Efforts to manage leaks that cannot be immediately identified should be under the supervision of management or emergency responders. If the source of the release has not been found; if special protective equipment is necessary to approach the release area; or if assistance is required to stop the release, the fire department should be called to halt the discharge at its source. Site personnel should be available to guide the fire department's efforts.

3. **Initiate spill notification and reporting procedures.** Report the incident immediately to the contacts in Section 2.2.2. Notify the appropriate authorities; a list of emergency contacts is provided in Section 2.2.3. If there is an immediate threat to human life (e.g., a fire in progress or fumes overcoming workers, etc.), an immediate announcement should be made to evacuate the building or area, and the fire department should be called. Request the assistance of the fire department's hazardous materials response team if an uncontrollable spill has occurred and/or if the spill has or is likely to enter waters beyond the facility boundaries.

4. **Recover or clean up the material spilled.** As much material as possible should be recovered and reused where appropriate. Material that cannot be reused must be declared a waste. Solid materials that have absorbed liquids may be shoveled into containers or drums. When such containers or drums are filled after a cleanup, the lids should be secured and the containers appropriately labeled (or relabeled) identifying the material(s), the date of the spill/cleanup, and the facility name and location. Combining non-compatible materials can cause potentially dangerous chemical and/or physical reactions or may severely limit disposal options. Material compatibility information can be found on SDSs.
5. **Cleanup of the spill area.** Surfaces that are contaminated by the release should be cleaned by the use of an appropriate substance or water. Cleanup water should be minimized, contained, and properly disposed. Occasionally, porous materials (such as wood, soil, or oil-dry) may be contaminated; such materials may require special handling for disposal.
6. **Decontaminate reusable tools and equipment used in cleanup.** If reusable tools and equipment are dedicated to cleanup efforts, they should be decontaminated before replacing them in the spill control kit.
7. **Arrange for proper disposal of any waste materials.** Waste materials from the cleanup must be properly characterized. Representative sampling and analysis may be necessary to make this determination. The General Manager should verify that the waste is transported and disposed of in compliance with applicable laws and regulations.
8. **Review and improve.** Pacific Seafood management and operating personnel should review spill response efforts, notification procedures, and cleanup equipment usage to evaluate their adequacy during the incident. Implement corrective actions including but not limited to plan revision and training where deficiencies are noted.

2.5 Training and Implementation of the Plan

Personnel engaged in wastewater operations and maintenance, as well as all managers are trained to prevent unauthorized or unplanned discharges and spills. Annually, these personnel receive spill response and prevention training and Hazard Communication training. Managers are trained on proper notification procedures for reporting slug discharges. Currently Additional training and equipment has not been identified as being required to operate the slug discharge control plan or to prevent any slug discharge events from occurring.

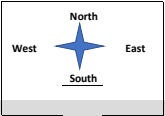
2.6 Description of Historical Unauthorized Discharges

There have not been any unauthorized discharges that occurred during the 36-month period prior to the effective date of this permit issuance.

Appendices

Appendix A – Facility Maps

Pacific Seafood Woodland Co.
1635 Down River Drive
Woodland, WA 98674

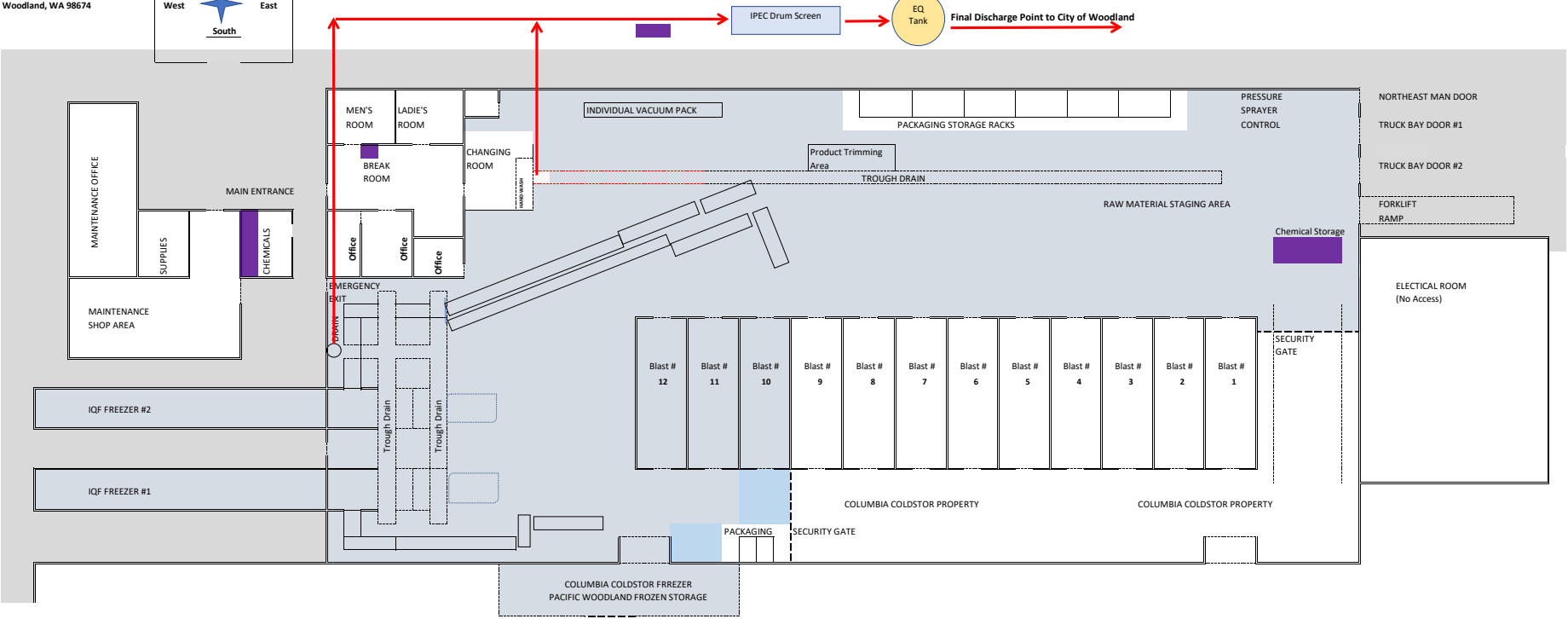


Facility Map

Main Building
2025

Outside Premises
Production Areas

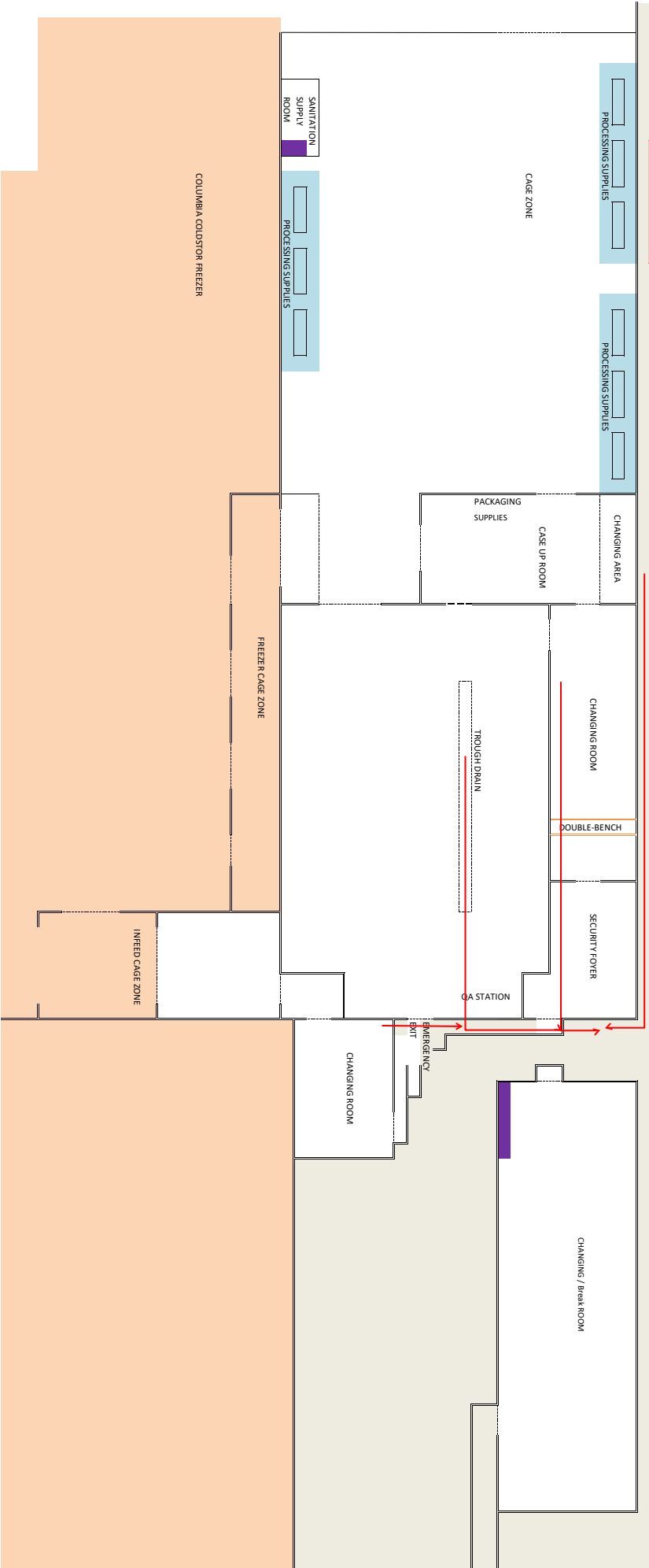
Chemical storage areas
Drains / Sewage Flow





Outside Premises
Columbia CS Freezer Zones

Chemical Storage Area
Drains / Sewage Flow



Appendix B – Chemical / hazardous Materials Inventory List

Hazardous Material Information

Hazardous Material Name	Max Amount Stored On-site	Average Amount Stored On-site	Number of Days On-site	Storage Location	Storage Containment
example: Phosphoric Acid	600 gal	500 gal	365	Main Building, first floor, in chemical cage	55 -gal plastic drum
AFCO 4312 Vigil- Quat - Quatranary Ammonium	110 gal	80 gal	365	Outside Building, in locked chemical storage.	55-gal plastic drum
AFCO Super Power Foam CL - Chlorinated Foam	110 gal	80 gal	365	Outside Building, in locked chemical storage.	55-gal plastic drum
Chlorolizer Plus - Chlorine	110 gal	80 gal	365	Outside Building, in locked chemical storage.	55-gal plastic drum
Propane	500 gal	400 gal	365	Outisde building, isolated in gravel lot	500-gal above ground metal tank
Sulfuric Acid	646 lbs	646 lbs	365	RTE Building, Standing Electric Forklift	Lead Acid Battery w/ gross weight 1847lbs