ELR Puyallup - Accidental Spill Prevention/Slug Discharge Plan (ASSP)

Purpose

The purpose of this ASPP is to provide operational guidance to EcoLube Recovery (ELR) team members at the Puyallup Transfer site related to authorized discharge to the City of Puyallup Sanitary Sewer. Conditions for discharge state the Oil/Water Separator must at all time comply per Puyallup Municipal Code (PMC) 14.06.013.

ELR is authorized to discharge contact water from tank storage containment. Contact water is defined as storm water that has fallen into containment areas. This water becomes a contact water due to the potential to be contaminated (or come into contact) with oil or antifreeze contained within the storage tanks, pumps, valves and hoses stored in the containment areas.

Responsibility

All ELR Transfer Site Employees are required to understand this plan and be familiar with the OWS process. EHS and Transfer Site Management shall ensure compliance with the permit and complete proper reporting as required by the authorization to discharge requirements.

Facility Description

ELR Puyallup is an oil transfer facility. Used oil is stored in above ground tanks until it is transferred to the ELR Portland facility where used oil is recycled in the re-refinery. The Puyallup facility owns a total of 11 above ground storage tanks on the site. There are 6 storage tanks in an uncovered containment area (east of the building), only 3 of which will be utilized for used oil storage – the remaining 3 tanks will be left empty and not used. There are 5 storage tanks situated in a covered loading area (south of the building), 3 of which will be used for new and used antifreeze storage – the remaining 2 will be left empty and not used. In addition to the 11 above ground storage tanks mentioned, there are 3 tanks situated completely inside the warehouse, also designed with containment – this containment area is isolated from any sources that would discharge to the Puyallup Sanitary Sewer.
Incoming and outgoing tanker trucks load and offload materials in the covered loading area, south of the facility. There is also a loading dock where package style trucks will offload various materials into the building for processing and storage. The loading dock pad is tied to Storm Water and discharges from this area are managed under the facility ISGP permit through the Department of Ecology.

The facility is designed with 3 separate containment structures that are all isolated from each other. Containment A surrounds the oil storage tanks. Containment C surrounds the antifreeze tanks and the covered loading pad. Containment B is located inside the building and surrounds the three window-wash/antifreeze tanks. Containment A is the only containment directly tied to the sanitary sewer system. Refer to Table 1 for a complete description of stored chemicals, quantities, and containment locations.

Table 1

Tank Number	Volume if Full (Gallons)	Contents	Containment Area
1	25,454	Used Oil	Containment A
2	25,454	Used Oil	Containment A
4	28,788	Used Oil	Containment A
7	24,881	Used Anti-Freeze	Containment C
8	25,523	New Anti-Freeze	Containment C
9	25,523	New Anti-Freeze	Containment C
12	1,500	Blended Anti-Freeze	Containment B
13	1,500	Blended Windshield Fluid	Containment B
14	6,100	Blended Anti-Freeze	Containment B

Routine Discharge Practices

The Puyallup ELR facility will accumulate contact water, due to precipitation falling within uncovered containment, in the "Oil Tank Storage Farm" or Containment Area A. Containment in this area was designed to meet Federal EPA standards for Spill Prevention Counter Control Plan (SPCC) requirements (taking into consideration 25 year, 24 hour precipitation event) and has a capacity of roughly 24,000 gallons. The containment area is equipped with 2 surface drains that are tied to the sanitary line exiting containment. Contact water will accumulate in containment until ELR employee manually engages a sump pump to transfer water into the above ground oil water separator (Hydro Flo Technologies, Model 24). Once water has passed through the oil water separator (compliant with PMC 14.06.13), it will be discharged into the Sanitary line where it will comingle into the City water once leaving the site.

ELR employees will make observations of accumulated water in Containment A prior to engaging the sump pump to ensure there are no signs of contamination from oil, or other potential contaminants, that would cause a disturbance at the POTW or that would not comply with the discharge authorization prescribed by the City of Puyallup municipal code.

ELR will not have continuous discharge unless the sump pump is engaged by and ELR employee. The discharge would remain constant if water was accumulated and/or accumulating due to storm event.

Inspections and Maintenance

ELR employees are required to inspect tank storage (including tanks, valves, piping, hoses, etc.) on a daily basis but required to document inspections monthly to comply with facility SPCC requirements. In addition to tank storage inspections, containment inspections are also required on a daily basis to ensure there are no breaches in containment or potential spills that could contaminate sanitary discharge. Maintenance on containment structures would be performed both in house or by a third party contractor, dependent upon the severity of a non-conformity observed.

Handling and Transfer of Materials

Transfer of materials in tank storage areas is done by way of pumps, hoses, valves, and piping. In the case of accumulated oil on site (in a tote or drum) the container would be transported to the covered loading zone (Containment C) where the material will be reclaimed back into the oil storage tanks. No pumping/ offloading of materials into oil tanks will be performed in Containment A.

Loading and Unloading

Loading and Unloading of products is performed in one of two places at the ELR Puyallup facility. Used and new antifreeze is onloaded and offloading in the covered loading area, Containment C. In addition to antifreeze, used oil is also loaded and offloading in the covered loading area, Containment C. The other location where loading and unloading will be performed is at the loading dock to the east of the facility – this area is not connected to sanitary sewer, rather industrial storm water. Materials loaded and offloaded in this area consist of totes and drums with a variety of different product streams including spent oil filters and profiled used oily debris (non-hazardous) in drums and window washer fluid and antifreeze in totes.

Control of Plant Site Run-Off

The ELR Puyallup facility is constructed to contain (or infiltrate) any water falling in or out of containment structures. Water from Containment A will be directed to City Sewer. Any water entering Containment C would be managed internally – due to the area being covered, it is not anticipated ELR would expect significant amounts of water to accumulate in this area. Containment B is located inside the warehouse and is not subject to water runoff.

Water outside the containment structures and the building will be managed under the site ISGP and not subject to regulation under the facility discharge authorization with the City of Puyallup. Water in these areas is routed to catch basins and sump vaults that are directly tied to industrial storm water.

There is an area to the far east of the facility that will not be paved however the area will not be in use, per the facility lease agreement, and infiltration is approved.

OWS Process Management

Water in Surface Drains and/or Containment

Before operating the system, inspect all receivers, pumps and surface drains to ensure that they are clean. The contact water collected at the surface drains and in containment should also be inspected for possible contamination before the OWS system is initiated. Any standing contact water which appears turbid and or contaminated with visible oily residue or oily deposits should be considered contaminated and not dischargeable to sewer.

Contaminated Water in Surface Drains in Containment

In a situation where contact water is deemed contaminated, a third-party company would be

consulted to retrieve the contaminated water out of the system. The containment area would be pressure washed (not using any solvents or additives) and the water would be recovered by the third-party vendor. Materials would be properly disposed of dependent on the type of contamination.

Discharge of Water in Containment A

When contact water is deemed as qualified to discharge to the sewer system the operator will follow the standard operating procedure:
start the pump in Containment A. The operator must immediately perform the following steps:

1. Inspect water in containment prior to starting the pump
2. Start the pump
3. Inspect the OWS tank for the correct amount of flow
4. Keep the system in "ON" status only to pump down contact water

The OWS system be inspected every hour for potential problems and continuous service. The system may be left in the ON function for as long as necessary to pump down the contact water in containment. However, if rainfall stops or if the contact water has been completely pumped down, the system must be returned to OFF status. The OWS should never be left in an ON or AUTO position as this could cause inadvertent discharge of contaminated water to sewer, causing an accidental, unplanned release of potentially hazardous materials into the public utilities systems. Any process water or pressure washing water must be diverted to a designated storage tank.

Oil Spills while OWS is ON

In the event that a spill occurs while the OWS system is in operation, the system should be immediately returned to OFF status and all valves closed to prevent an accidental release of hazardous materials into the public sanitary sewer system. ELR employees are required to take the following steps

- Notify Branch Manager and EHS Manager immediately
    - Notifying the management of a spill incident is a permit requirement and not a voluntary decision. *Possible enforcement action could be served on an employee for failure to report any incident which occurs in the plant.*
- Complete an Incident Report and submitted to manager
- Inspect Surface Drains and OWS for Oil Contamination
- Clean Oil Spill using Third Party Contractor or onsite vacuum truck (if available)
- Dispose or reclaim material as applicable

Notification of Spills to City of Puyallup

Users shall notify the Puyallup POTW immediately upon the occurrence of a slug of accidental discharge of substances regulated by Chapter 14.06 of the municipal code. The notification shall include location of discharge, date, time, type of material, concentration, volume and corrective action completed. Any affected user shall be liable for any expense, loss, or damage to the POTW, in addition to the amount of

any fines imposed on the city on account thereof under state or federal law.

Within five days following an accidental discharge, the user shall submit to the administrator a detailed written report describing the cause of the discharge and the measures to be taken by the user to prevent similar future occurrences. Such notification shall not relieve the user of any expense, loss damage, or other liability that may be incurred as a result of damage to the POTW, fish kills, or any other damage to person or property; nor shall such notification relieve the user of any fines, civil penalties, or other liability that may be imposed by this chapter or other applicable law.

Employee Training

Employees are trained, at least annually, on spill prevention techniques and OWS process instruction. New Hire employees receive on the job training to learn how to operate the system correctly and in compliance with the facility permit. Training topics include:

- SPCC requirements
- ASPP requirements
- System Controls
- Spill Clean Up
- Reporting Requirements