



Warwick Sewer Authority (WSA) – Industrial Pretreatment Program (IPP)

Slug Discharge Prevention and Control Plan

The Federal Government, through the provisions of the General Pretreatment Regulations (40 CFR Part 403), and the Federal Water Pollution Act, also known as the Clean Water Act (33 United States Code (U.S.C.) § 1251 *et seq.*), requires that the local Sewer Authority establish procedures for the enforcement of pretreatment standards and requirements. In accordance with Article 6 of the Warwick Sewer Authority's (WSA) Sewer Use Ordinance (SUO) the WSA may require any user who discharges into the Publicly Owned Treatment Works (POTW) to ensure compliance with pretreatment methods and regulations including pollutant limits.

Industrial Users identified as Significant Industrial Users (SIUs) are required to submit a Slug Discharge Prevention and Control Plan as part of the submittal of their Application for Wastewater Discharge Permit. Additionally, the Authority may require any other User whose Discharge could negatively impact the treatment facility to provide a Slug Discharge Prevention and Control Plan with their Application for Wastewater Discharge Permit.

By definition, 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 reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, local limits and/or Permit conditions. The General Pretreatment regulations also define a slug (discharge) loading as any pollutant discharge violating the specific prohibitions under 40 CFR 403.5 (b).

These specific prohibitions include the following list of pollutants:

1. pollutants which create a fire or explosion hazard in the POTW;
2. pollutants which will cause corrosive structural damage to the POTW;
3. solid or viscous pollutants which will cause obstruction in the POTW;
4. any pollutant, including oxygen demanding pollutants (COD, BOD, etc.) released in a discharge at a flow rate and/or pollutant concentration which will cause interference with the POTW;
5. heat in amounts which will inhibit biological activity in the POTW resulting in interference, but in no case heat in such quantities that the temperature at the POTW exceeds 40°C (104°F);
6. petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through at the POTW;
7. pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems; and/or,
8. any trucked or hauled pollutants, except at discharge points designated by the POTW.

The Slug Discharge Prevention and Control Plan is intended to assist the User in evaluating their current practice in prevention and control of slug discharges. Additionally, completion of a Plan will allow the Authority's Industrial Pretreatment Program (IPP) to properly assess the User's potential to impact the POTW, as well as the User's ability to prevent and remediate slug discharges.

The Slug Discharge Prevention and Control Plan shall contain, at a minimum, the following elements:

1. Description of discharge practices, including non-routine batch discharges;
2. Description of stored chemicals;
3. Procedures for immediately notifying the Authority of slug discharges, including any discharge which would violate a prohibition under 40 CFR Part 403, with procedures for follow-up written notification within five days;
4. If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site runoff, worker training, building of containment structures or equipment, measurements for containing toxic organic pollutants (including solvents) and/or measures and equipment for emergency response.

Users that are required to maintain a Slug Discharge Prevention and Control Plan must notify the POTW immediately of any changes at its facility affecting potential for a Slug Discharge.

Users that are required to maintain a Slug Discharge Prevention and Control Plan must provide the POTW with a revised plan where changes made at its facility may affect potential for a Slug Discharge. Revisions are due to the WSA within 30 days of implementing changes at the facility.

SIUs are required to certify in their Annual Inspection Report submittal that the Slug Discharge Prevention and Control Plan on file with the POTW is current. If the Plan on file is not current, a revised Plan must be provided with their Annual Inspection Report submittal.

SIUs are required to certify in their Renewal Application of their Wastewater Discharge Permit that the Slug Discharge Prevention and Control Plan on file with the POTW is current. If the Plan on file is not current, a revised Plan must be provided with their Application for renewal of their Wastewater Discharge Permit.

When the Slug Discharge Prevention and Control Plan has been completed, please retain a **COPY for your records** and **mail the ORIGINAL** document, complete with signatures and attachments (where required) to:

Edward Mathias, Pretreatment Coordinator
Warwick Sewer Authority
125 Arthur W. Devine Boulevard, Suite B
Warwick, RI 02886

On behalf of our Pretreatment Program, we thank you in advance for your cooperation in ensuring we receive the completed forms and for your steadfast commitment to environmental protection through pretreatment compliance.

Section 1 – General Facility Information

Name of Company or Corporation:	
“Doing Business As” (DBA) if different from Company/Corp. Name:	
Facility Address:	

Authorized Contact Name:	
Title:	
Work Phone Number:	
Cell Phone Number:	
Email Address:	

Secondary Contact Name:	
Title:	
Work Phone Number:	
Cell Phone Number:	
Email Address:	

A. Provide a brief description of the manufacturing processes, facilities or service activities that occur on the premises, *specifically* those processes which involve process wastewater or hazardous materials. Use additional sheets as necessary.

B. Is your facility subject to Federal Categorical Pretreatment standards as per 40 CFR 403? If yes, please include the categorical classification(s).

	No - The facility is not subject to Federal Categorical Pretreatment Standards.
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	Yes - The facility is subject to Federal Categorical Pretreatment Standards including:	
New Source Applicable Subpart:	Existing Source Applicable Subpart:	
Other Applicable Pretreatment Standard(s):		

C. Please provide the following information regarding your facility’s operating schedule and number of employees.

	S	M	TU	W	TH	F	S
NUMBER OF EMPLOYEES – FIRST SHIFT							
NUMBER OF EMPLOYEES – SECOND SHIFT							
NUMBER OF EMPLOYEES – THIRD SHIFT							

D. List the average daily volume of water discharged or consumed by process (attach sheets if needed).

Source	Volume (gallons per day)	Estimated or Measured	Indicate meter location(s) within facility
City Sewer System			
Natural Outlet (NPDES)			
Waste Hauler			
Evaporation			
Contained in Product			
Landscaping			

E. Company's history regarding previous slug discharge (include dates where applicable):

Section 2 -- Facility Layout and Flow Diagrams

Please provide the following diagrams to supplement your company's slug discharge prevention and control plan:

- **General Layout of The Facility Showing (where applicable):**
 - Property boundaries
 - Entrance and exit routes
 - Manufacturing areas
 - Hazardous materials process & storage areas
 - Waste handling, storage and treatment facilities
 - Loading and unloading areas
 - Drainage direction
 - Floor drains, pipes, channels and drainage destinations

- **Facility's Flow Showing (where applicable):**
 - Piping and instrumentation
 - Flow rates
 - Tanks and capacities
 - Treatment systems
 - Final destinations of flows

Section 3 – Chemical and Materials Data

Your company must provide sufficient data on all materials of concern used and stored at the facility. This information is useful in determining the origin of a slug, potential hazards and appropriate slug response procedures. Descriptions of the materials handled, the location of these materials, description of containment, transfer and transport, as well as any additional comments should be provided as follows:

- **Materials** – both chemical and trade names should be listed in the inventory list. This information may help minimize confusion over the constituents of a compound and facilitate proper response procedures to a slug.
- **Location of Materials in Plant** – knowing the location of the material will assist plant employees and emergency response personnel in locating areas initially affected by a spill.
- **Maximum Volume/Container Volume** – this information is useful in determining the potential impact of a slug.
- **Container Description** – the description should include the type of container (e.g., steel drum, fiberglass tank, etc.) and the presence of container attachments (i.e., valves, pumps, transfer pipes, etc.) to assist in determining the potential origin of a slug load.
- **Transfer and Transport Areas** – the condition of containers and transfer equipment is useful in assessing the potential for accidental spills or slug discharges of high strength wastes and possible effects on the treatment plant.
- **Additional Comments** – comments may include information on the physical, chemical or toxicological effects of the material and special precautions when handling the material. Information provided may include procedures to prevent contact between incompatible materials. The facility must demonstrate that the following three compatibility aspects have been considered: (1) construction of container; (2) other materials in immediate vicinity; and (3) the surrounding environment.

Please use the chart on the following page and attach additional pages if necessary. However, you may also choose to attach an existing company chart or spreadsheet where the aforementioned criteria are included.

Section 4 -- Slug Prevention Equipment and Procedures

A. Ensure that appropriate slug prevention equipment is present at following locations (where applicable).

LOCATION	EQUIPMENT (i.e., berms, sumps, trenches, tanks, etc.)
STORAGE AREA	
LOADING/ UNLOADING	
PROCESS	
TREATMENT	
OTHER	

B. Ensure that inspection and maintenance procedures exist including the following (check all that apply).

- INSPECTIONS AND MAINTENANCE OF CONTAINERS AND TANKS**
- INSPECTIONS OF STORAGE PROCESS, LOADING AND UNLOADING AREAS**
- PROPER LABELING OF MATERIALS/CHEMICALS**
- USE OF SECURITY AND SAFETY WARNING SIGNS/ALARMS**
- INSPECTIONS AND MAINTENANCE OF SLUG PREVENTION/RESPONSE EQUIPMENT**

C. Please provide a brief synopsis of the applicable inspection and maintenance procedures (i.e., frequency of inspection/maintenance, log books, etc.):

Section 5 -- Emergency Response Equipment and Procedures

A. Ensure that the following emergency response equipment are in place in the event that slug prevention procedures fail and a slug discharge occurs (check all that apply).

- COMMUNICATION EQUIPMENT AND/OR ALARMS**
- SPILL CONTAINMENT AND CONTROL EQUIPMENT**
- SPILLED MATERIAL STORAGE CONTAINERS**
- PROTECTIVE CLOTHING**
- RESPIRATORS**
- FIRST AID KITS**
- VENTILATION EQUIPMENT**
- DECONTAMINATION EQUIPMENT/CONTRACTED DECONTAMINATION FIRM**
- OTHER:**

B. Please provide a brief synopsis of the applicable emergency response equipment inventory (i.e., locations, quantity on hand, etc.):

C. Ensure that the following emergency response procedures are in place in the event that slug prevention procedures fail and a slug discharge occurs.

NOTIFICATION OF RESPONSIBLE PERSONNEL (CHAIN OF COMMAND):

EVACUATION PROCEDURES:

SAFETY AND FIRST AID PROCEDURES:

[Empty box for Safety and First Aid Procedures]

NOTIFICATION OF OUTSIDE ASSISTANCE:

[Empty box for Notification of Outside Assistance]

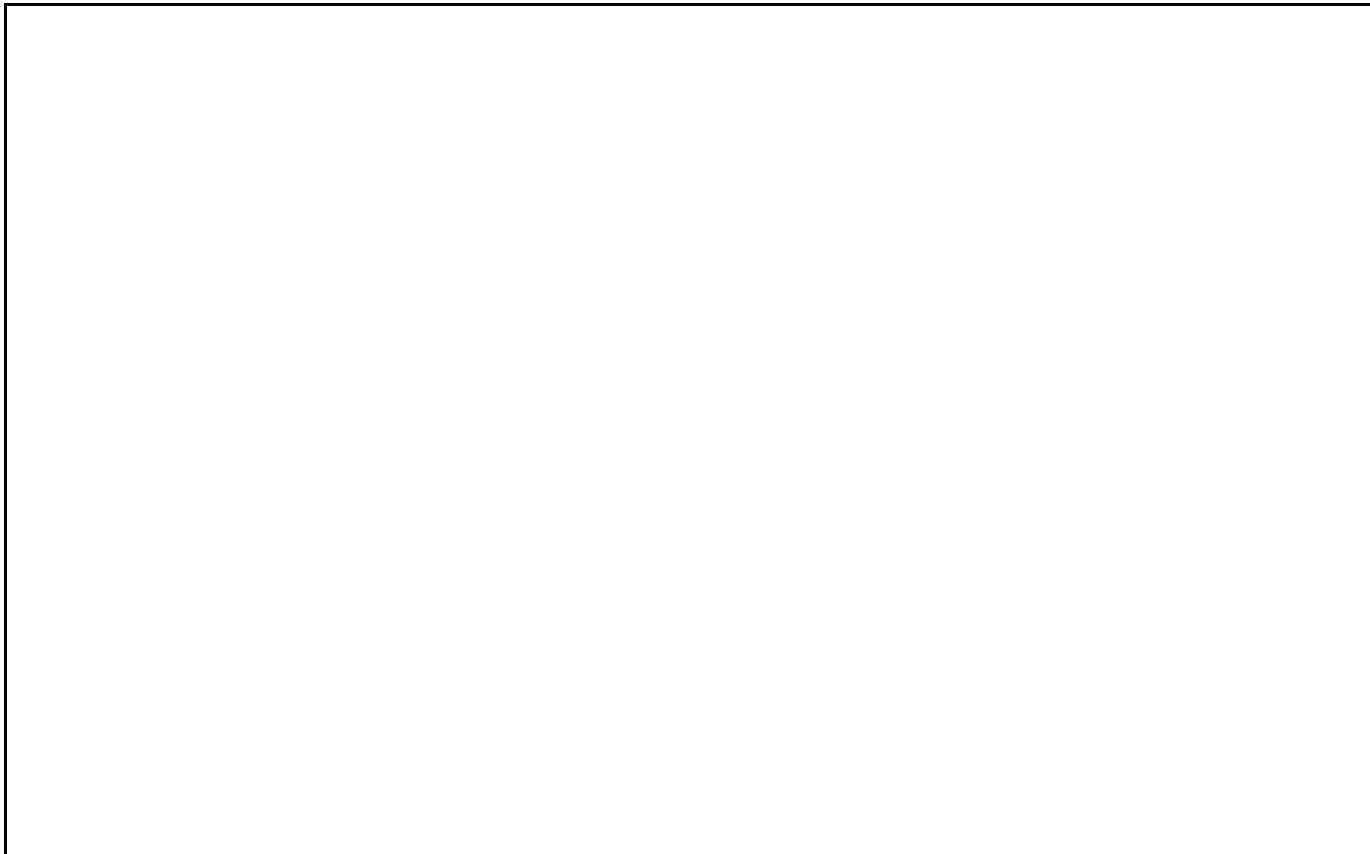
SPILL AND SLUG ASSESSMENT PROCEDURES:

[Empty box for Spill and Slug Assessment Procedures]

SPILL AND SLUG CLEAN-UP PROCEDURES:

[Empty box for Spill and Slug Clean-up Procedures]

DECONTAMINATION PROCEDURES:

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PROCEDURES FOR PREVENTING CONTACT BETWEEN INCOMPATIBLE MATERIALS:

A large, empty rectangular box with a black border, intended for writing procedures for preventing contact between incompatible materials.

PROCEDURES FOR DISPOSING OR TREATING SPILLED MATERIALS:

[Empty box for procedures for disposing or treating spilled materials]

OTHER PROCEDURES:

[Empty box for other procedures]

Section 6 -- Slug Reporting and Control Plan Modification

SLUG REPORTING:

Responsible facility personnel must immediately notify the Warwick Sewer Authority Pretreatment Coordinator (401-468-4725) of a slug discharge.

Additionally, a “Slug Discharge Notification Sheet” must be emailed to the Pretreatment Coordinator within 24 hours of the incident at edward.f.mathias@warwickri.gov.

Include additional reporting measures here (i.e., other City, State or Regional Agencies/Departments Notified):

SLUG CONTROL PLAN MODIFICATION PROCEDURES:

An immediate modification to the plan will be warranted should any of the information contained herein change.

ADDITIONAL COMMENTS:

Section 7 -- Training Program

Training Consists Of (check which apply):

- Review of the chemicals used at the plant, the locations of the chemicals used in the facility, the hazards posed by chemical use and the proper procedures for chemical handling and disposal**

- Review of locations of the lift stations, drains, pumps, valves, tanks, etc. Associated with plant chemical operations and pretreatment**

- Review of the slug discharge prevention and control plan**

Personnel Training (check which apply):

- Involves All Personnel**

- Limited to Manufacturing, Treatment and Cleanup Personnel**

Frequency (check which apply):

- Train New Employees Immediately**

- Provide refresher course on interim basis for existing employees**

ADDITIONAL TRAINING COMMENTS:

Section 8 -- Certifications

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted.

Based on my inquiry of the person or persons directly responsible for managing compliance with the slug control measures in this slug discharge prevention and control plan, I certify that, to the best of my knowledge and belief, the information supplied herein is true, accurate and complete and this facility is implementing the slug discharge prevention and control plan submitted to the Warwick Sewer Authority.

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Printed Name of Authorized Agent Responsible for the Slug Control Plan

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Title of Authorized Agent

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Signature of Authorized Agent

Date