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### Wastewater Permit Fact Sheet and Statement of Basis for Permit Limits

Permit Number:	SIU-2026-001
Facility Name and Physical Address:	American Structures & Design, Inc. 1801 132 <sup>nd</sup> Ave E, STE 100 Sumner, WA 98390 Parcel No. 4495401281
Type of Facility:	Fabricated Structural Metal Manufacturing
Standard Industrial Classification Code (SIC):	NAICS 332312
Permit Classification & Applicable Categorical Standard:	Categorical Industrial User 40 CFR Part 433 – Metal Finishing Point Source Category
Discharge Location:	Outfall 001A City of Sumner, WA Sumner Wastewater Treatment Plant, WA0023353
Contact at Facility:	Kenny Brown, Production Manager (253) 245 - 2366 <a href="mailto:kenny@asandd.com">kenny@asandd.com</a>
Contact for Permit:	Tina Gregory, Project Manager (253) 245 - 2375 <a href="mailto:t.gregory@asandd.com">t.gregory@asandd.com</a>
Responsible Official:	Mark Weissenbuehler, President 1801 132 <sup>nd</sup> Ave E, STE 100 Sumner, WA 98390 (253) 883 - 4343 <a href="mailto:mark@asandd.com">mark@asandd.com</a>

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**A. Fact Sheet Revision History:**

Version 1: 3/4/26

**B. Summary of Operations:**

**Facility Processes**

American Structures & Design, Inc. (AS&D) fabricates and distributes aluminum railings, balconies, sunshades, and related architectural building products. The facility receives formed aluminum extrusions from third-party vendors, then cuts, drills, and assembles those components prior to surface finishing.

The process generating industrial wastewater is AS&D's aluminum surface preparation (metal finishing) line performed prior to powder coating. The surface preparation system is described as a four-stage non-chrome pretreatment wash system that uses reverse-osmosis (RO) treated city water for rinses and chemical application.

Before powder coating, aluminum material is sprayed with an acid wash, then rinsed in a two-stage cycle, and treated with a non-chromium primer/conversion coating. Wastewaters are largely recycled within the system (Stage 2 and 3 RO rinses are filtered and recycled; Stage 1 is recirculated with oil skimming/filtration), which limits the volume of wastewater ultimately discharged.

All wastewater generated from the surface treatment process is conveyed to a transfer/clarifier configuration and then to a final discharge tank. The final effluent (pretreated) is discharged to the City's POTW as batch discharge events at an anticipated average rate of approximately 500 gpd, and the authorization allows discharge up to the established permit flow limit.

**Ancillary Processes**

AS&D's metal finishing/surface preparation system is the wastewater-generating process. Ancillary activities that occur at a fabrication/powder coat facility (and that are typically managed under BMPs to prevent discharge) include: equipment maintenance (lubricants, hydraulic fluids), housekeeping/cleanup in production areas, and material handling/loading and unloading. City and State BMP requirements specifically require controls for loading/unloading operations, housekeeping practices, and runoff contamination prevention, indicating these ancillary activities are expected and must be managed to prevent pollutant introduction to the sanitary sewer or stormwater systems.

**Process Chemicals Stored at Facility**

AS&D's surface preparation system uses proprietary pretreatment chemicals and pH adjustment chemicals associated with the wash system and discharge conditioning. The application identifies chemical inventory items including CoreBond 31 and Core Clene 5011-T used in the non-chrome pretreatment process, and sulfuric acid (50%) and caustic soda (50%) used for pH adjustment. The facility also uses RO-treated water (generated from city water via an RO system) as the primary rinse/process water.

**Maintenance and Ancillary Chemicals at Facility**

BMP/manual requirements anticipate facility use/storage of materials that require standardized controls, including inspection and maintenance of storage tanks, housekeeping practices in storage areas, handling/transfer of solid waste materials, and worker training—indicating ancillary chemicals/materials are expected to be managed under a BMP framework.

### **Waste Generation and Storage**

AS&D generates industrial solid wastes and residuals associated with aluminum fabrication and the surface preparation system. The application identifies aluminum chips that are recycled offsite (Tacoma Metals) and indicates periodic removal/management of process wastes and residuals.

Waste residuals generated by the pretreatment system, include oils and spent filters: Stage 1 wash water is skimmed to remove oils and filtered; skimmed oils are hauled offsite, and filters are removed and disposed. Stage 2 and 3 RO rinse waters are filtered and recycled, with spent filters removed and disposed as solid waste.

### **Storm, Surface, and Subsurface Water**

AS&D indicates it applied for and received a Conditional No Exposure Exemption (CNE) for stormwater (CNE Number 312661), implying industrial activities and materials are managed to avoid exposure to precipitation and to minimize stormwater contamination potential.

### ***C. Summary of Process Wastewater:***

Wastewater is produced during aqueous cleaning, rinsing, and non-chromium surface treatment of aluminum components prior to powder coating.

Process wastewater consists primarily of rinse waters and controlled bleed-off from a multi-stage pretreatment wash system. The facility employs internal recirculation and filtration to minimize wastewater generation, resulting in intermittent discharge volumes rather than continuous flow.

All industrial wastewater is routed to a dedicated discharge tank where it is equalized prior to discharge. The discharge tank provides a single point for flow determination and effluent sampling. Wastewater is discharged to the sanitary sewer as intermittent batch discharges through Outfall 001A, an above-ground discharge pipe equipped with a sampling port located downstream of all pretreatment and upstream of connection to the public sewer.

The wastewater may contain regulated pollutants associated with metal finishing operations, including conventional pollutants (such as pH, oil and grease, biochemical oxygen demand, and total suspended solids), metals, and other constituents regulated under applicable pretreatment standards. All discharges must comply with the effluent limitations, monitoring requirements, and other conditions specified in this permit.

### ***D. Summary of Pretreatment:***

Industrial wastewater generated at the facility is treated through an on-site pretreatment system designed to remove metals and other regulated pollutants associated with aluminum surface preparation operations prior to discharge to the sanitary sewer.

The pretreatment system consists of a multi-stage aqueous surface preparation process followed by equalization and controlled batch discharge. Aluminum components are processed through a four-stage, non-chromium pretreatment wash system that includes an initial cleaning stage and subsequent rinse and conversion coating stages. Reverse-osmosis (RO) treated water is used for rinsing and chemical application to reduce dissolved solids and minimize pollutant loading.

Wastewater from the pretreatment process is largely recirculated and filtered within the system to reduce discharge volumes. Solids and residual oils generated during cleaning are removed through filtration and

skimming as part of routine system operation. Spent filters and removed residuals are periodically taken out of service and managed offsite in accordance with applicable waste regulations.

All process wastewater requiring discharge is conveyed to a dedicated discharge (equalization) tank, which serves as the final pretreatment control point. The discharge tank provides hydraulic equalization, allows for pH stabilization, and enables representative sampling prior to discharge. No dilution or blending with non-process water is used to achieve compliance.

Discharge from the pretreatment system occurs as intermittent batch discharges from the discharge tank to the sanitary sewer via a single permitted outfall. Batch discharge operation allows the facility to control discharge timing, verify compliance with applicable effluent limits, and ensure that wastewater characteristics remain consistent with pretreatment standards.

The pretreatment system is designed and operated to achieve compliance with applicable federal categorical pretreatment standards, local limits, and other permit requirements. When properly operated and maintained, the system provides adequate treatment capacity to control metals, pH, oil and grease, and other regulated constituents associated with the facility's metal finishing activities. The system is currently in service and is maintained in operable condition consistent with manufacturer recommendations and best management practices.

#### **E. Summary of Compliance with Previous Permit**

The facility previously discharged industrial wastewater under a City-issued authorization that established effluent limitations, batch discharge requirements, and self-monitoring obligations for the metal finishing process.

Available compliance information indicates that the facility implemented the required pretreatment controls and monitoring practices during the prior authorization period. No chronic or ongoing noncompliance affecting the sanitary sewer system or treatment plant has been identified.

This permit supersedes the prior authorization and incorporates comparable or more stringent effluent limitations, monitoring requirements, and operational controls. The issuance of this permit does not relieve the Permittee of responsibility for any unresolved compliance issues that may have occurred prior to the effective date.

#### **F. Flow Limit**

The permitted industrial wastewater discharge from the facility is limited to an average daily flow of 900 gallons per day (gpd) at the authorized discharge point.

The facility's industrial wastewater is generated intermittently as batch discharges from a dedicated discharge tank serving the aluminum surface preparation process. Because discharges occur only when a batch is released, the facility does not have a continuous average daily flow in the traditional sense. Instead, the effective average daily flow on days when a discharge occurs is expected to be substantially less than the maximum daily limit, with typical batch volumes anticipated to be lower than 900 gpd.

The maximum daily flow limit is based on:

- The design and operating capacity of the facility's discharge tank and pretreatment system;
- The batch discharge configuration, which allows controlled release of wastewater rather than continuous flow;
- The need to protect the hydraulic capacity and treatment performance of the publicly owned treatment works

(POTW); and

- The Control Authority's requirement to limit industrial contributions in a manner that prevents pass-through, interference, and operational disruption.

Flow is determined by manual tank gauging, using calibrated volume markings on the discharge tank. The volume discharged during each batch event is calculated by measuring the tank level before and after discharge. The total daily flow is the sum of all batch volumes discharged during a calendar day.

No discharge in excess of the maximum daily flow limit is authorized. Any increase in flow above this limit, or any change from batch discharge to continuous discharge, requires prior written approval and a permit modification.

### **G. Special Permit Conditions:**

#### **1) Accidental Discharge / Slug Discharge Control Plan (AD/SDCP)**

An Accidental Discharge and Slug Discharge Control Plan (AD/SDCP) is required. The Permittee shall develop, implement, and maintain a written AD/SDCP that describes measures to prevent, detect, and respond to spills, accidental discharges, and slug loads that could adversely affect the sanitary sewer system or treatment works.

The AD/SDCP shall, at a minimum, address:

- Identification of potential spill and slug discharge sources;
- Spill prevention, containment, and response procedures;
- Emergency notification procedures and contact information;
- Employee training and spill response responsibilities; and
- Procedures for preventing recurrence of accidental discharges.

If an AD/SDCP has been previously submitted and approved, the Permittee shall review and update the plan as necessary to reflect current operations and shall submit revisions to the Control Authority upon request. The Permittee shall notify the Control Authority of any facility or operational changes that increase the potential for accidental or slug discharges.

#### **2) Solvent Management Plan / Toxic Organic Management Plan (SMP/TOMP)**

A Solvent Management Plan (SMP) or Toxic Organic Management Plan (TOMP) is required in lieu of routine Total Toxic Organics (TTO) sampling, subject to approval by the Control Authority.

The SMP/TOMP shall describe procedures used to minimize or eliminate the discharge of toxic organic compounds to the sanitary sewer, including:

- An inventory of organic chemicals used or stored onsite;
- Storage, handling, and transfer practices;
- Waste handling and disposal procedures;
- Spill prevention and response measures; and
- Employee training related to organic chemical management.

Unless otherwise approved, the Permittee may be required to perform at least one round of TTO sampling and analysis to demonstrate compliance with applicable pretreatment standards prior to approval of a TTO

monitoring waiver. Upon approval of the SMP/TOMP and any required baseline sampling, the Permittee may submit periodic certification statements in lieu of routine TTO monitoring, as allowed by applicable pretreatment regulations.

If an SMP/TOMP has been previously submitted, the Permittee shall maintain the plan and review it periodically to ensure it remains current. Revisions shall be submitted to the Control Authority upon request.

### **3) Best Management Plans**

The Permittee shall implement and maintain pollution prevention and best management practices (BMPs) to minimize the generation of pollutants in industrial wastewater and to prevent the introduction of prohibited substances into the sanitary sewer.

These practices shall address, as applicable:

- Good housekeeping and material handling;
- Chemical and waste storage;
- Equipment maintenance and inspection;
- Management of solids, filters, and residuals generated by pretreatment operations; and
- Measures to prevent stormwater or non-process waters from contacting industrial materials.

Formal submittal of a separate Pollution Prevention Plan or Pollutant Management Plan is not required at issuance unless requested by the Control Authority. The Permittee shall make BMP documentation available for review during inspections.

### **4) Flow Management Plan (FMP) and Additional Monitoring**

A Flow Management Plan (FMP) is not required at this time due to the facility's batch discharge configuration and relatively low discharge volume. Flow is controlled through a dedicated discharge tank and measured using manual tank gauging.

The Control Authority may require development of an FMP or additional monitoring if future changes in operations, discharge frequency, or flow volume warrant additional controls.

### **5) Flow Measurement, Equipment Maintenance, and Calibration**

The Permittee shall maintain all equipment used to measure, monitor, and control industrial wastewater discharges in proper working order.

Flow is determined by manual tank gauging using calibrated volume markings on the discharge tank. The Permittee shall:

- Maintain clear and legible volume markings on the discharge tank;
- Periodically verify the accuracy of tank volume measurements; and
- Ensure that any instruments used for monitoring pH or other parameters are calibrated and maintained in accordance with manufacturer specifications.

If automated monitoring equipment is installed in the future, the Permittee shall maintain calibration records and perform routine maintenance as required by the Control Authority.

## **6) Operation and Maintenance (O&M) Requirements**

The Permittee shall operate and maintain the pretreatment system at all times to ensure effective treatment and compliance with permit limits. Operation and maintenance requirements include:

- Routine inspection and servicing of pretreatment system components;
- Timely replacement of filters, media, and worn components;
- Maintenance of adequate treatment capacity; and
- Proper management and disposal of pretreatment residuals.

Failure to properly operate and maintain the pretreatment system constitutes a permit violation.

## **7) Logs, Recordkeeping, and Certification**

The Permittee shall maintain records sufficient to document compliance with this permit, including but not limited to:

- Flow measurements and discharge volumes;
- Sampling results and laboratory reports;
- Pretreatment system operation and maintenance activities;
- Calibration and inspection records for monitoring equipment;
- Spill and slug discharge incidents and corrective actions; and
- Training records related to wastewater management.

Records shall be retained for a minimum of three (3) years, or longer if required by enforcement actions or litigation.

All self-monitoring reports, certifications, and other required submittals shall be signed by an authorized representative and shall include the applicable certification statement required by pretreatment regulations, affirming that the information submitted is true, accurate, and complete.

### **H. Sampling Location:**

Effluent sampling for compliance with this permit shall be conducted at Outfall 001A, the designated sampling location for the facility's industrial wastewater discharge.

Outfall 001A is located on an above-ground discharge pipe downstream of all pretreatment processes and the discharge (equalization) tank and upstream of the connection to the public sanitary sewer. This location represents the Final Effluent after all treatment and prior to any dilution or mixing with sanitary, storm, or other non-process waters.

The sampling point is configured with a fixed, accessible sampling port that allows for the collection of grab and composite samples representative of each batch discharge. The sampling location provides sufficient hydraulic conditions (including adequate flow and turbulence during discharge) to ensure representative sampling and safe sample collection.

The Permittee shall maintain the sampling location in a condition that allows:

- Safe and unobstructed access for facility staff and Control Authority personnel;
- Proper placement of sampling equipment;

- Collection of representative samples during each batch discharge; and
- Compliance with approved sampling methods and quality assurance requirements.

No alternative sampling locations may be used for compliance monitoring without prior written approval from the Control Authority. Any modification to the discharge piping, sampling port, or pretreatment system that could affect the representativeness of samples must be reported to the Control Authority and may require permit modification.

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**I. Basis for Concentration Limits and Monitoring Requirements:**

**EFFLUENT LIMITATIONS**

**REPORTING REQUIREMENTS**

Parameter <sup>1</sup>	Average Daily Effluent Limitations	Maximum Daily Effluent Limitations	Sample Type	Reporting Frequency
pH	Within the range 5.5 and 10.0 SU		Grab	Daily
Non-Polar Oil & Grease	100 mg/L	100 mg/L	Grab	Quarterly
Total Suspended Solids	-	300 mg/L	Grab	Quarterly
Copper, Total	1.42 mg/L	1.42 mg/L	Grab	Quarterly
Zinc, Total	1.48 mg/L	1.93 mg/L	Grab	Quarterly

**Notes on Monitoring and Reporting:**

- All required laboratory analysis for self-monitoring reports shall be performed by an accredited lab, certified for the analysis by the State of Washington

<b>pH</b>	pH shall remain within the range of 5.5 to 10.0 standard units, measured using grab samples collected during each discharge event.
<b>Basis:</b>	The pH limitation is based on local pretreatment standards established in SMC 13.18 and is necessary to protect the integrity of the sanitary sewer collection system, prevent corrosion or scaling, and maintain conditions suitable for biological treatment processes at the publicly owned treatment works (POTW). Grab sampling is appropriate because pH can vary rapidly and must be controlled at all times during discharge.
<b>Non-polar Oil &amp; Grease</b>	Non-polar oil and grease shall not exceed 50 mg/L as either an average or maximum daily concentration. Grab samples shall be collected and analyzed using an approved method.
<b>Basis:</b>	The oil and grease limit is derived from local pretreatment standards in SMC 13.18 and is intended to prevent sewer blockages, operational problems, and interference with treatment processes. Grab sampling is appropriate due to the potential for episodic releases and the need to capture peak concentrations.
<b>Total Suspended Solids</b>	Total suspended solids shall not exceed 300 mg/L as a daily maximum. Grab samples shall be collected and analyzed using an approved method.
<b>Basis:</b>	The TSS limit is based on local limits established to protect the hydraulic capacity and treatment efficiency of the POTW.
<b>Copper, Total</b>	Total copper is limited to 1.42 mg/L as both an average and maximum daily concentration. Grab samples shall be collected and analyzed using an approved method.
<b>Basis:</b>	Copper is regulated under the Metal Finishing categorical pretreatment standards (40 CFR Part 433) and under local limits. The applicable limit reflects the most stringent requirement to prevent pass-through and interference and to ensure compliance with downstream treatment and biosolids quality objectives.
<b>Zinc, Total</b>	Total zinc is limited to 1.48 mg/L as an average concentration and 1.93 mg/L as a maximum daily concentration. Grab samples shall be collected and analyzed using an approved method.
<b>Basis:</b>	Zinc is regulated under both categorical pretreatment standards and local limits. The selected limits represent the most stringent applicable requirements.