Snohomish County
Public Works
Surface Water Management

Aaron Reardon
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3000 Rockefeller Ave., M/S 607
Everett, WA 98201-4046

April 13, 2007

Mr. Steve White
Cascade Auto Wrecking
18412 Bothell-Everett Hwy
Bothell, WA. 98012

Mr. White,

Surface Water Management was contacted by Alderwood Sewer District and King County Waste Water Treatment Division to conduct an inspection of Cascade Auto Wrecking based upon recent sewer inspections which identified the discharge of flammable materials to the sanitary sewer. This letter is intended to follow up on a joint site visit at Cascade Auto Wrecking conducted by staff of Surface Water Management (SWM), the Department of Ecology and Alderwood Sewer District.

The purpose of the site visit was:

- to verify the locations and direction of flow for onsite drainage infrastructure,
- to identify deficiencies in best management practices (BMPs) which may contribute to discharge of contaminants to the storm drain system or waters of the state,
- to inform appropriate facility representatives of problems and,
- to provide technical assistance to Cascade Auto Wrecking.

As an automotive recycler, you are identified by the Washington State Department of Ecology (Ecology) as having a high potential to pollute. As such, your facility has been issued an Industrial Stormwater Permit (NPDES) permit by Ecology. The permit requires you to implement operational and structural best management practices which prevent the discharge of polluting materials. This permit also requires that you submit quarterly discharge monitoring reports to Ecology. You are advised to review and implement conditions of that permit.

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Snohomish County Surface Water Management (SWM) conducts inspections of facilities that are believed to be discharging pollutants to waters of the state or public drainage systems owned and operated by the County. Snohomish County Water Pollution Control Code (SCC 7.53) prohibits the discharge of one or more polluting materials into these systems. Any person found to be discharging pollutants to these systems shall control contaminated discharge by implementing best management practices (BMPs) to prevent violations of SCC 7.53. These BMPs may include development and implementation of a spill control plan, site operation and maintenance practices, material handling and storage practices or other BMPs as described in Ecology's Stormwater Manual. A copy of SCC 7.53 was provided to Jerry Lial during our site visit.

Staff from each agency entered the facility at approximately 12:45 on 3/28/07, and immediately introduced themselves to Jerry Lial. Mr. Lial stated he was the manager and would escort representatives during the inspection.

While onsite, SWM used a Stormwater Compliance Inspection Form to evaluate the implementation of BMPs consistent with activities conducted at Cascade Auto Wrecking and Ecology's Stormwater Manual. Mr. Lial signed this form, and a copy is provided to you as reference.

The following information was documented and is organized according to areas onsite and BMPs specific to activities in those locations.

General housekeeping

- Vehicle holding, processing and storage areas exhibited staining on the ground
- A sink onsite may be inappropriately plumbed to the ground
- The two vehicle/parts processing areas are not designed to contain spills, exhibited poorly implemented secondary containment, and illicit discharges to storm drain systems.
- The onsite drainage system is poorly maintained as evidenced by a thick layers of oil and sludge found in your below ground oil water separator and compacted dirt filling in onsite catch basins.
- Poorly implemented hazardous waste management and spill prevention practices have led to illicit discharges of process waste water to onsite storm drain systems which ultimately discharge to the County drainage and waters of the state.

Vehicle Holding Yard

Vehicles are held north of the office prior to dismantling and draining of fluids. Staining of soils was observed in this graveled area. Surface Water Management recommends that you:

- Inspect all vehicles arriving at the holding area immediately for the potential leakage of fluids.
- Vehicles which leak should be taken to a fully covered and contained process area immediately. Drip pans should be used as necessary to prevent contamination of soils, surface or ground waters.

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Waste/Scrap Piles of Vehicle Components

Scrap engines, transmissions, gas tanks and other scrap parts stored outside can cause pollution of surface water and soils contamination. SWM documented several areas onsite where scrap engines, transmission and other scraps were exposed to storm water and sitting directly on the ground. You are advised to:

- Store scrap components on an impervious surface, concrete or chemically resistant asphalt containment pad under a roof or waterproof tarp. To prevent stormwater run-on and runoff, install a dike, berm or other physical barrier around the perimeter, and/or inward sloping of the pad with appropriate outside grading to a sump.

- Ensure that all fluids have been drained from scrap parts.

Vehicle/Parts Processing Areas

Two vehicle/parts processing areas where identified onsite.

The vehicle fluids processing area was found west of the office building behind a galvanized fence. Mr. Lial stated that vehicles are often refueled or washed in this area as well. Fluids are drained from vehicles under cover, contained and transported to the fluids disposal area using buckets. This area exhibited soils staining. A large tote was used to contain spent antifreeze.

While secondary containment was provided for the tote, the containment system was full of fluids and needs maintenance. A hose leading from the secondary containment system used as overflow was directed to the ground. A bucket exposed to stormwater is used to catch drips from the tote valve. This bucket lacked secondary containment and may discharge to the ground and surface waters.

The parts processing area, found south of the office, is of particular concern. Process waste water was found around and inside a catch basin in this covered area. From here, Mr. Lial explained that waste water containing spent fluids are pumped to an above ground oil water separator and then back to the storm drainage system. The process waste water then flows into your below ground oil water separator. Over 2 inches of oily scum and deep sludge was found in this oil water separator. The process waste water discharges through Verbeek Wrecking drainage and eventually to the County drainage system and North Creek. The discharge of process waste water to the County drainage system and waters of the state is prohibited by SCC 7.53.

Significant volumes of waste fluids are drained from vehicle parts to buckets kept primarily on a concrete pad. Although covered, these activities remain partially exposed to stormwater. In addition, the concrete pad lacks an adequate berm, slope or physical structure which would prevent runoff from entering the storm drainage system.

The pavement in the parts processing area was badly stained which suggest inadequate spill prevention and clean up. Mr. Lial pointed to a spill kit in a yellow container which was not easily accessible or provided with appropriate signage.

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In addition to measures addressed on previous pages, SWM strongly recommends that you:

- Cease discharge of process waste water to the storm drainage system.
- Immediately clean and routinely maintain your below ground oil water separators and other storm drainage systems. A schedule of these activities should be included in your Stormwater Pollution Prevention Plan.
- Immediately remove the hose from the secondary containment system discharging to the ground and appropriately dispose of the fluids found in the totes secondary containment system.
- Determine where the sink discharges to and inform SWM.
- Cease washing of vehicles, unless the wash water can be directed to a dead end sump and vactored out routinely or sent to sanitary sewer. If a dead end sump is used, it must include a locked drainage valve or plug kept in the closed position. Clean the sump as needed.
- Install a berm, slope concrete pads or design another physical barrier to contain all waste fluids drained from vehicles and parts. The systems should prevent stormwater from running onto the pad and running off to adjacent areas.
- Use drip pans or other methods to contain spent fluids while refueling vehicles.
- Properly manage, contain and label containers used for spent fluids. The Snohomish Health District regulates dangerous wastes and have requirements specific to your operation. You are advised to contact the Solid Waste and Toxics group at 425-339-5250 to assist you in properly managing your waste.
- Store reactive, ignitable, or flammable fluids in accordance with applicable uniform fire code requirements and hazardous waste regulations.
- Ensure applicable employees are provided spill response training and that these records are kept onsite.
- Examine areas where fluids are stored. Clean up any accumulated fluids promptly and repair leak and spill sources.

To assist in your efforts to implement the identified deficiencies, see Ecology's 2005 Stormwater Management Manual volumes 4 and 5. To obtain a copy via the web go to Ecology's website at http://www.ecy.wa.gov/programs/wq/stormwater/manual.html. Or you may purchase a hard copy by calling Ecology's publication office at 360-407-7472.

Ecology also published a document titled: Vehicle Recyclers: A Guide for Implementing the Industrial Stormwater General National Pollution Discharge Elimination System Permit Requirements. January 2006. Publication #94-146.

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This document may be found via the web at http://www.ecy.wa.gov/biblio/94146.html

This letter is not a notice of violation of SCC 7.53. However, if a violation of the code is documented in the future, Surface Water Management may initiate the issuance of a citation and note that our technical assistance has failed to gain voluntary compliance. A citation would contain binding requirements to perform actions on your site, and may contain monetary penalties. Continued violations for the same problem may result in criminal penalties.

We appreciate your willingness to implement identified deficiencies to ensure compliance with SCC 7.53. A follow up visit will be conducted to determine progress. Please call if you have questions.

Regards,

Steve Britsch
Water Quality Specialist
Snohomish County Surface Water Management
425-388-3464 x 4668

Cc: Case folder 2007-0047
Chris Dew, Department of Ecology
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