



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

April 26, 2012

**CERTIFIED MAIL**

**7010 2780 0001 6284 6651**

Mr. Ed Armstrong  
Seattle Iron & Metals Corp  
601 S Myrtle St  
Seattle, WA 98108

RE: Warning Letter - Noncompliance with NPDES Industrial Stormwater General Permit No. WAR 125002, terms and conditions and RCW 90.48.

Dear Mr. Armstrong:

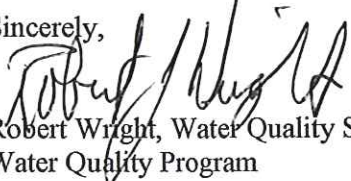
On January 5 and March 14, 2012, Ecology conducted inspections at Seattle Iron & Metals Truck Parking facility located at 730 S. Myrtle Street, Seattle. The purpose of these inspections was to determine compliance with NPDES Industrial Stormwater General Permit #WAR125002.

**In order to come into compliance with NPDES Industrial Stormwater General Permit #WAR125002 requirements and RCW 90.48, the facility must comply with the following correctives actions:**

- **Submit to Ecology within 30 days upon receipt of this notice, a revised Stormwater Pollution Prevention Plan (SWPPP) that meets Permit Condition S3,**
- **Provide proper cover and containment for all liquid chemical and petroleum products and wastes stored outside at the facility,**
- **Keep all dumpsters, scrap metal bins and drums under cover or fit with a lid that must remain closed when not in use,**
- **Immediately clean up all petroleum leaks and spills.**
- **Immediately improve the operational source control practices at the facility.**
- **Develop a plan for collecting and conveying stormwater at the facility that will allow for stormwater treatment and discharges that meet permit benchmarks.**

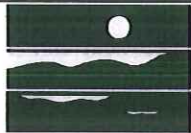
The enclosed inspection report provides additional information. The violations described above are subject to formal enforcement actions and may result in the issuance of formal enforcement actions including civil penalties of up to \$10,000 per day per violation.

Sincerely,

  
Robert Wright, Water Quality Specialist  
Water Quality Program

RJW:bl  
Attachment





State of Washington Department of Ecology  
Northwest Regional Office  
**STORMWATER COMPLIANCE INSPECTION  
REPORT**

WADOE Stormwater  
Compliance Inspection Form  
(last file update 4-04.)

Facility Type:  
 Industrial  Boatyard  
 Construction  S & G

Section A: General Data

Inspection Date 1/5/2012 and 3/14/2012	NPDES Permit # <b>WAR125002</b>	County King	Receiving Waters Duwamish River
Discharges to: Surface Water <input checked="" type="checkbox"/> Ground Water <input checked="" type="checkbox"/>		Weather at time of inspection: Showers	

Section B: Facility Data

Name and Location of Facility Inspected Seattle Iron & Metals Annex 730 South Myrtle Street Seattle, WA 98108	Entry Time 1:00 pm	Permit Effective Date 1-01-10
	Exit Time 3:00 pm	Permit Expiration Date 1-01-15
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Ed Armstrong/Operations Manager/206-682-0040 John Franklin/Civil Services Manager/206-682-0040	Other Participants: Megan Wisdom, Seattle Public Utilities	
Name, Address of Responsible Official/Title/Phone and Fax Number. Marc Sidell/ Vice President/ 206-682-0040 601 S. Myrtle Street Seattle, WA 98108 Phone Number      Fax      Contacted? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Samples Taken? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Photos Taken? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Section C: Areas Evaluated During Inspection.

<input checked="" type="checkbox"/> NPDES Permit Available	<input type="checkbox"/> Wet & Dry Season Inspection Reports	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Effluent/Receiving Water
<input type="checkbox"/> Storm Water Pollution Prevention Plan Available	<input type="checkbox"/> Employee Training Records	<input checked="" type="checkbox"/> Oil/Water Separator	<input type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> SPCC Plan & Equipment	<input type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Solid Waste Disposal	<input type="checkbox"/> Laboratory
<input type="checkbox"/> Erosion and Sediment Control Plans	<input type="checkbox"/> Monitoring Plan	<input checked="" type="checkbox"/> Catch Basins	<input type="checkbox"/> 0.5 inch Inspection Logs
<input checked="" type="checkbox"/> DMR Submittals	<input checked="" type="checkbox"/> Fuel/Chemical Storage	<input checked="" type="checkbox"/> Track out / Wheel wash	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Section D: Summary of Findings/Comments

**Background:**

This compliance inspection was conducted as part of a Department of Ecology inspection program to control the potential sources of pollutants discharged to the Duwamish Waterway through storm drainage systems. Megan Wisdom, Stormwater Inspector with Seattle Public Utilities also participated in this inspection.

Seattle Iron & Metals (SIM) operates a large scrap metal recycling and processing facility at 601 S. Myrtle Street. The operation is covered under Individual NPDES Industrial Stormwater Permit # WA031968. SIM leases property on the north side of S. Myrtle Street for the storage of trucks, drop-boxes, dumpsters, bins and miscellaneous equipment and materials associated with their scrap metal operation. SIM obtained coverage for this facility under NPDES Industrial Stormwater General Permit # WAR125002 in early 2011.

**Inspection/Observations:**

On January 5, 2012, I stopped by the SIM Truck Parking Facility (Annex) located across the street from the main scrap metal plant. The street was flowing with a lot of highly turbid stormwater. I documented that much of the stormwater flowing from the SIM Annex facility was turbid and had a visible sheen on it (see Photos # 1, 4, 5). I took photos and decided to consult with Ecology and Seattle Public Utilities (SPU) staff before contacting SIM on that day. I returned to the facility on January 26 with Ed Abbasi the permit manager for the SIM individual stormwater permitted facility and met with Ed Armstrong and John Franklin. We discussed the fact that the facility was more than just a truck parking operation and that they would need to



include monitoring for lead and TPH as a scrap metal facility. The two main discharge locations were enhanced to facilitate easier sample collection. The Discharge Monitoring Reports submitted reveal discharge levels for copper and zinc are more than 10 times the benchmark levels and more than 100 times more than the permit benchmark levels for turbidity.

I returned to facility on March 14, 2012 with Megan Wisdom from SPU in an effort to better understand the drainage system in the vicinity. I contacted Ed Armstrong and John Franklin with SIM who assisted with the site inspection. I conducted a compliance inspection but was not able review the Stormwater Pollution Prevention Plan at that time. A copy of the site map for the facility was provided. SIM installed the discharge enhancement that was discussed with SIM on January 26, at the two discharge locations to aid in sample collection (see Photos # 9, 10). The sausage booms and straw wattles were not providing adequate treatment of the oily turbid stormwater run-off.

Stormwater discharges from the SIM Annex facility and flows across the unpaved shoulder of S. Myrtle Street (see photos # 1, 4, 5, 6, & 7). The stormwater likely picks up petroleum and turbidity as it flows across this unpaved shoulder. Stormwater from the SIM Annex flows into several storm drain catch basins on S. Myrtle Street.

Most of the stormwater within the facility had a significant sheen on it (see Photos # 11, 12, 15 & 16). The permit requires them to immediately clean up spills and leaks to prevent the discharge of pollutants. The permit also requires "empty" scrap metal bins and dumpsters (unless they are clean) to be stored under cover or be provided with a lid that remains closed when not in use (see Photos # 13, 14).

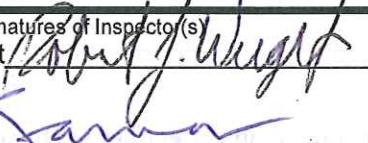
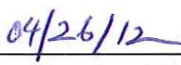

The facility was also storing "empty" drums that were damaged and waiting for repair or scrapping. These drums all had residual metals and fluids in them. The permit requires that all scrap metals bins (or drums) be stored under cover or be fitted with a tight fitting lid. The permit also requires that scrap metal chips, grindings and/or turnings not be allowed to remain on the ground and exposed to stormwater. It is a permit violation to store drums with liquid chemical or petroleum products or wastes without proper cover and containment (see Photos # 17-21). Formal enforcement is being considered for permit noncompliance.

#### Issues & Requirements:

The following must be completed in order to come into compliance with NPDES Industrial Stormwater General Permit # WAR125002 and RCW 90.48 (Water Pollution Control Law):

- Update the Stormwater Pollution Prevention Plan in accordance with permit condition # S3. Include the last 6 monthly inspection report forms and the spill log.
- The facility must also monitor in accordance with the requirements for scrap metal recycling (Table 3 # 2), Total Lead and TPH.
- Include the cleaning practice and procedures for all scrap metal dumpsters and/or containers in the SWPPP.
- Provide proper cover and containment for all liquid chemical or petroleum products or wastes stored outside at the facility.
- Immediately clean up petroleum spills and leaks and log into spill log as appropriate.
- Develop and submit a plan for complying with the permit.
- **The updated SWPPP will be reviewed for compliance with permit requirements and must be submitted to Ecology within 30 days.**

Contact Robert Wright at 206-909-6640 with any questions or concerns regarding this report.

Name(s) and Signatures of Inspector(s) Robert Wright 	Agency/Office/Telephone WA Dept. of Ecology/ NW Regional Office/ 425-649-7060  3190 160 <sup>th</sup> Ave SE, Bellevue, WA 98008-5452	Date 4-5-12  
Signature of Management Q A Reviewer 	Agency/Office/Phone and Fax Numbers WA Dept. of Ecology/NWRO/ (425) 649-7000 Fax (425) 649-7098	

**UNANNOUNCED** Inspection



Seattle Iron & Metals Annex, Seattle  
January 5, 2012



#1. **DESCRIPTION:** Seattle Iron & Metals Truck Parking (Annex) has coverage under the Industrial Stormwater General Permit. The site is a little over 3 acres and is divided into 3 sections. This gate is located on S. Myrtle Street. The turbid stormwater has a visible sheen on it.



#2. **DESCRIPTION:** There are no catch basins or storm drain systems on the site. Stormwater run-off sheet flows to a low point and then through the chain link fence and onto the unpaved shoulder of S. Myrtle Street.



#3. **DESCRIPTION:** These straw wattles are on the outside (downstream) side of the fence. The wattles do not appear to improve the turbidity of the stormwater run-off.



#4. **DESCRIPTION:** The stormwater leaving the fenced area of the SIM Annex is oily and turbid. The stormwater then flows across the unpaved shoulder of S. Myrtle Street and towards the catch basins on Myrtle.



Seattle Iron & Metals Annex, Seattle  
January 5, 2012



#5. **DESCRIPTION:** All of the stormwater on Myrtle Street between the SIM Annex chain link fence and the paved portion of Myrtle St was very turbid and oily.



#6. **DESCRIPTION:** The stormwater from SIM Annex flows into several storm drain catch basins on Myrtle. This one is located on the north side of S. Myrtle just east of where 7<sup>th</sup> Avenue comes in from the south.



#7. **DESCRIPTION:** This storm drain catch basin is located at the southeast corner of S. Myrtle and 7<sup>th</sup> Ave. The stormwater was extremely turbid. Some could be traced to SIM Annex but a large contribution was also coming from other sources and the unpaved shoulder of S. Myrtle Street itself.



#8. **DESCRIPTION:** This storm drain catch basin is located on Fox Avenue at the northwest corner of the SIM Annex.



Seattle Iron & Metals Annex, Seattle  
March 14, 2012



#9. **DESCRIPTION:** After a brief discussion between Ecology and SIM on January 26, SIM officials installed the ecology blocks to enhance their ability to collect stormwater run-off samples. The sausage booms and straw wattles were not providing adequate treatment of the oily turbid stormwater run-off.



#10. **DESCRIPTION:** The stormwater flows from the ecology blocks to the chain link fence and then onto Myrtle Street. The quality of the stormwater was not noticeably improved on the discharge side of the fence.



#11. **DESCRIPTION:** Most of the stormwater puddles on the facility were turbid and a petroleum sheen present.



#12. **DESCRIPTION:** The petroleum leak or spill (lower left of photo) was enough to cause a black layer on the nearby puddle. The permit requires leaks and/or spills to be cleaned up immediately.



Seattle Iron & Metals Annex, Seattle  
March 14, 2012



**#13. DESCRIPTION:** These scrap metal bins are "empty". But contain varying amounts of residue. The ground may have pavement under the dirt layer. Stormwater is very turbid.



**#14. DESCRIPTION:** This scrap metal dumpster (drop box) is "empty" but unless it is clean, it must be stored under cover or be fitted with a lid that remains closed when not in use. Stormwater falling into this bin will flush pollutants out of the holes and unsealed ends and onto the ground.



**#15. DESCRIPTION:** The petroleum sheen observed on the stormwater here was traced to an area where drums were stored (see Photo # 16).



**#16. DESCRIPTION:** The drums stored here are damaged and are waiting for repair or to be scrapped. Stormwater flows from the drums towards the photographer. The permit requires these drums to be stored under cover or be provided with a tight fitting lid.



Seattle Iron & Metals Annex, Seattle  
March 14, 2012



**#17. DESCRIPTION:** This scrap metal cannot be allowed to remain on the ground and exposed to stormwater. The ground in this area was covered with scrap metal chips, turnings and/or grindings. Dirt surface makes it difficult to pick up spilled or leaked metals.

**#18. DESCRIPTION:** The spilled scrap metal fines must be picked up in some manner and not be allowed to remain on the ground.



**#19. DESCRIPTION:** Most of these drums were "empty" but all contained residual scrap metals and cutting fluids. Some of the drums in this area contained cutting fluids and/or coolants. Liquid products or wastes stored outside must be provided with proper cover and containment.



**#20. DESCRIPTION:** The white fluid is a coolant or cutting fluid. The storage of this fluid in an uncovered drum out in the open is a violation of the permit.



Seattle Iron & Metals Annex, Seattle  
March 14, 2012



**#21. DESCRIPTION:** This entire area is a major source of stormwater pollution. All scrap metal debris must be cleaned up off the ground and all drums stored under cover or removed from the facility. All liquid chemical and petroleum products and/or wastes must be stored with proper cover and containment.

**#22. DESCRIPTION:** A petroleum sheen was observed on nearly all of the stormwater on site. A more aggressive source control effort for control and cleaning up petroleum leaks and spills is necessary.



**#23. DESCRIPTION:** The western most third of the 3-section facility is sometimes used to stored flat bed trailers and containers. This area may also be paved but is covered with a hard layer of dirt. The periodic storage of crushed cars, and the container and equipment repair and maintenance at this facility demonstrates that this operation is more than just truck parking.

**#24. DESCRIPTION:** The facility must make a better effort to prevent scrap metals from getting onto the dirt and picking it up when it does.