



STORMWATER COMPLIANCE INSPECTION REPORT

State of Washington Department of Ecology
3190 – 160th Avenue SE, Bellevue, WA 98008-5452

WADOE Stormwater Compliance Inspection Form
Last updated (01/06)

Phone: (425) 649-7000
FAX: (425) 649-7098

Section A: General Data

Inspection Date May 16, 2006	NPDES Permit # SO3001896D	County KING	Receiving Waters Green River	Inspector Megan Wisdom	Facility Type Industrial
Discharges to: Surface Water <input checked="" type="checkbox"/> Ground Water <input type="checkbox"/>				UNANNOUNCED Inspection	

Section B: Facility Data

Name and Location of Site inspected A E Downs Enterprises 22227 76 th Ave S Kent, WA 98032-1924	GPS Entrance: Lat: N 47° Long: W122°15.290' 25.937' Discharge: Lat:47° Long: 122° 15.214' 25.917'	Entry Time 10:18	Permit Effective Date 1/14/2005
		Exit Time 10:55	Permit Expiration Date 9/20/2007
On-Site Representative(s): Name(s)/Title(s)/Contact number(s) or E-mail Jean Crocker- Secretary		Additional Participants: Jaron Smith- Ecology	
Responsible Official(s): Barbara Downs A E Downs Enterprises 22227 76 th Ave S Kent, WA 98032-1924 Phone: (253) 872-8147		Yes No Samples Taken? <input type="checkbox"/> <input checked="" type="checkbox"/> Photos Taken? <input checked="" type="checkbox"/> <input type="checkbox"/>	

Section C: Discharge Monitoring Reports (DMRs)

	Max	2003				2004				2005			
		2 nd	3 rd	4 th	1 st	2 nd	3 rd	4 th	1 st	2 nd	3 rd	4 th	
pH	6-9	NQ	8.07	5.53	4.59	NQ	5.34	6.31	6.66	5.02	NQ	M	
Zinc (µg/L)	117	NQ	80	63	176	NQ	489	47	56	71	NQ	M	
Oil & Grease (µg/L)	15	NQ	B	4.9	5.9	NQ	6	5.4	6.4	5.6	NQ	M	
Turbidity (NTU)	25	NQ	5.11	4.5	15	NQ	11.3	5.9	8.8	10.3	NQ	M	
Copper (µg/L)	63.6	N/A	7	NQ	M								
Hardness		N/A	5	NQ	M								
Lead (µg/L)	81.6	N/A	20	NQ	M								

M = Missing (not submitted); NQ = No Qualifying Event; Err = Lab Error; B= Below detect limit

Section D: Summary of Findings/Comments

BACKGROUND

A E Downs Enterprises is covered under the General Stormwater Industrial NPDES / State Waste Discharge Permit (the General Permit). Ecology's stormwater unit has conducted an inspection at this Industrial site in the past. The purpose of this inspection is to conduct a compliance inspection per the requirement of the Revised Code of Washington (RCW) 90.48.560 and to provide technical assistance as appropriate.

INSPECTION/OBSERVATIONS

Upon arrival we (Megan Wisdom and Jaron Smith) met Jean Crocker the secretary for the facility. She said Barbara Downs is the facility's stormwater permit manager and that she wouldn't be available until later in the day. Ms. Crocker provided us with a copy of the facilities Stormwater Pollution Prevention Plan (SWPPP). The SWPPP failed to meet the requirements of permit condition S9.

Ms. Crocker pointed out a catch basin on the north side of the building that she thought was the sample point. This catch basin is located in the facility parking lot near the building. This sampling point is not the ideal location, as it does not represent the industrial practices at this facility. There is a catch basin on the west side of the facility where it appears stormwater from the back of the facility flows to in a rain event. (P5160042). The stormwater from this area of the facility would be a better representation of the industrial activities at the site (P5160041). When I spoke with Barbara Downs on the phone (May 18, 2006) she said that she was unsure where they have been sampling in the past, but would make sure all future stormwater sampling was in the area described above.

The exposed area on the west side of the building had two large dumpsters and numerous barrels full of wood debris, used paint cans, and other garbage (P5160038, P5160039 and P5160044). There was also a cart stacked with paint cans and two drums stacked on secondary containment crates in this area. The secondary containment crates are nearly full of stormwater and will not be effective at containing any chemical spills (P5160040 and P5160037). Secondary containment is

most effective if it is paired with cover to prevent rainwater from filling the space intended to collect spills.

Against the building on the west side of the facility is a shed that houses a compressor. The compressor appears to be leaking oil, which is seeping out from under the wall of the shed (P5160034). Oil leaks from the compressor need to be contained so that they do not come into contact with stormwater. We also observed several open bags of sawdust and a few drums that contained finely ground sawdust powder (P5160036). All sawdust needs to be kept in sealed containment. Sawdust is a pollutant and must not be allowed to mix with stormwater that will flow off-site to Mill Creek.

Section E: Compliance/Recommendations

- Producing and fully implementing an adequate Stormwater Pollution Prevention Plan (SWPPP) that meets the requirements of permit condition S9 is a requirement of your permit. Your current SWPPP does not meet all of the requirements for this permit condition and is a violation of your permit. Refer to condition S9 for content requirements and revise your current SWPPP in order to come into compliance with your permit. **Send a copy of your revised SWPPP to Megan Wisdom, Washington State Department of Ecology, Northwest Regional Office, 3190 160th Ave SE, Bellevue, WA 98008 within fourteen (14) days of receiving this inspection report.**
- Implement the proper chemical handling BMPs (such as cover and containment) for all chemicals at the site. Paint cans need to be stored properly and disposed of properly. Secondary containment that is allowed to collect stormwater freely is not effective in preventing potential spills of hazardous materials. (this is mentioned at the bottom of this section)
- Implement the necessary Best Management Practices (BMP) to prevent sawdust from polluting stormwater. Sawdust containers should be covered or sealed if stored outside or disposed of in uncovered dumpsters. Also, ensure that saw dust around the lot is swept up frequently and disposed of properly to reduce the potential to pollute stormwater.
- Implement the necessary BMPs around the compressor to prevent oil leaks from flowing out to exposed areas.
- Discharge monitoring may not have been conducted in the optimal location. Changing the location of your sampling point so that it is representative of the industrial activities of your facility is recommended. Discharge sampling from a new location may return results that are drastically different from the results at your current sampling location. Consider sampling from the catch basin located behind your facility, west of the dumpster near the railroad tracks. Contact Elaine Worthen with the Department of Ecology, at (360) 407-7229, when changing your sampling location.
- Sample results above benchmark values or outside of the benchmark range for pH, must prompt a Level One Response by the permittee as outlined in Condition S4.C of the permit. A Level One Response should be initiated due to pH readings outside of the benchmark range for pH. Copies of the results of the Level One Response should be included with the discharge monitoring report (DMR) as well as kept with the Stormwater Pollution Prevention Plan (SWPPP).

For assistance with any of these compliance issues or recommendation regarding Best Management Practices see the Stormwater Management Manual for Western Washington, volumes IV and V (SWMM). To obtain a copy of the SWMM you may go to Ecology's website at: <http://www.ecy.wa.gov/programs/wq/stormwater/manual.html>

The Department of Ecology has the authority to issue formal enforcement actions including issuance of orders and civil penalties of up to \$10,000 per day per violation for violations of your NPDES permit and/or state laws and regulations.

<p><i>Megan Wisdom</i> Megan Wisdom Industrial/Construction Stormwater Inspector Water Quality Program</p> <p><i>6/2/06</i> Date</p>	<p>Reviewed and approved by:</p> <p><i>Donald Seeberger</i> Donald Seeberger Unit Supervisor Water Quality Program</p> <p><i>06/05/06</i> Date</p>
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PHOTO ADDENDUM – A E DOWNS ENTERPRISES 5/16/2006



P5160035 DESCRIPTION: OIL LEAKING OUT AROUND COMPRESSOR SHED



P5160036 DESCRIPTION: EXPOSED AND OPEN BAGS OF SAWDUST POWDER



P5160037 DESCRIPTION: PAINT CANS STORED IMPROPERLY



P5160038 DESCRIPTION: BARRELS OF ASSORTED WASTE MATERIALS



P5160039 DESCRIPTION: MORE WASTE BARRELS AND OPEN SAWDUST CONTAINERS



P5160040 DESCRIPTION: BARRELS OF HAZARDOUS MATERIALS KEPT ON SECONDARY CONTAINMENT FULL OF RAIN WATER

PHOTO ADDENDUM – A E DOWNS ENTERPRISES 5/16/2006



P5160041 DESCRIPTION: SUGGESTED SAMPLE POINT



P5160042 DESCRIPTION: SEDIMENT TRAIL TO PROPOSED SAMPLE POINT



P5160044 DESCRIPTION: MORE TRASH, NOTE PAINT CANS

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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

JUN 06 2006

CERTIFIED MAIL

7005 1160 0000 0644 2066

Ms. Barbara Downs
A E Downs Enterprises
22227 76th Ave S
Kent, WA 98032-1924

Dear Ms. Downs:

RE: Warning Non-Compliance – with Stormwater Industrial General Permit at A E Downs Enterprises, Permit# SO3-001896D, on May 16, 2006

The purpose of this inspection was to determine compliance with your Industrial Stormwater General Permit (NPDES and State Waste Discharge Permit). Under this permit you are authorized to discharge stormwater associated with industrial activity to surface waters of the state contingent upon the compliance with the permit's terms and conditions.

There were areas not in compliance with the Industrial Stormwater General Permit at A E Downs Enterprises. These areas are listed in the enclosed Compliance Report. To correct them, please complete the actions listed in the compliance/recommendation section of the report (section E). Please be aware that failure to correct the areas that were out of compliance may result in the issuance of an administrative order and/or civil penalties of up to \$10,000 per day per violation.

Sincerely,

Megan Wisdom, Stormwater Inspector
Water Quality Program
Department of Ecology

MW:cg

Enclosure

