



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 8/7/2006	NPDES Permit # SO3000113D	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	GPS	Entry Time	Permit Effective Date									
Gaco Western Inc	Entrance: Lat: Long: 122°15'45.5" 47°26'04.2"	2:35p.m.	9/20/2002									
18700 Southcenter Parkway Tukwila WA 98188-4636	Discharge: Lat: Long:	Exit Time 3:20 p.m.	Permit Expiration Date 9/20/2007									
On-Site Representative(s): Name(s)/Title(s)/Contact number(s) or E-mail		Additional Participants:										
Responsible Official(s):												
Corinne Dobbins Gaco Western PO Box 88698 Seattle, WA 98188 Phone: (206) 575-0450 or (206) 357-2729		<table border="0"> <tr> <td></td><td>Yes</td><td>No</td></tr> <tr> <td>Samples Taken?</td><td><input type="checkbox"/></td><td><input checked="" type="checkbox"/></td></tr> <tr> <td>Photos Taken?</td><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td></tr> </table>			Yes	No	Samples Taken?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Photos Taken?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	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)

		2003			2004				2005				2006			
	Max	2 nd	3 rd	4 th	1 st	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	5.59	6.61	M	5.52	6.22	6.16	6	6	6.04	M	M	M	M		
Zinc (µg/L)	117	551	490	M	567	43	75	626	72	730	M	M	M	M		
Oil & Grease (µg/L)	15	5	B	M	5.9	B	B	B	5.8	5.9	M	M	M	M		
Turbidity (NTU)	25	16	2.2	M	4	4.2	7.2	3.3	10.8	6.4	M	M	M	M		
BOD (mg/L)	30	10	2	M	7	2	6	3	3	6	M	M	M	M		
Copper (µg/L)	63.6			M		B	5	19	3	14	M	M	M	M		
Hardness				M		2	7	12	2	6	M	M	M	M		
Lead (µg/L)	81.6			M		B	B	B	B	B	M	M	M	M		
Nitrate/Nitrite (mg/L)	.68	.59	.43	M	.84	.027	.026	.184	.02	1.14	M	M	M	M		
Phosphorus (mg/L)	2	.44	.26	M	.13	.034	.074	.175	.058	.808	M	M	M	M		

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

Section D: Summary of Findings/Comments

BACKGROUND

Gaco Western Inc. is covered under the General Stormwater Industrial NPDES / State Waste Discharge Permit (the General Permit). Ecology's stormwater unit has not 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 I met Corinne Dobbins the compliance officer for the facility. Per my request Ms. Dobbins provided me with a copy of the site Stormwater Pollution Prevention Plan (SWPPP). The SWPPP needs to be updated as some of the processes and contact names have changed.

No recent Discharge Monitoring Reports (DMRs) were available because Ms. Dobbins said she had been told by Ecology that she need not sample due to consistent attainment of benchmark values. Based on Ecology's records Gaco Western can suspend sampling for some, but not all parameters. The parameters that must still be sampled are: pH, Zinc, copper, hardness, lead and Nitrate/Nitrite. Visual monitoring records do not exist for the site because according to Ms. Dobbins they have not been conducting the visual monitoring as required by permit condition S4.D.1.

Ms. Dobbins said that Gaco Western was one of the test sites for a Zinc study performed by Ecology. She said that the representative suggested they sample from the roof drains due in part to their manufacturing process and because of the stormwater conveyance system layout (photo P8070019). Gaco Western manufactures waterproofing sealant and according to Ms. Dobbins the most likely spot for stormwater to come into contact with any potential pollutants at the facility is on the roof due to the venting systems from the manufacturing process. The roof drains go to a grassy field and then infiltrates to an underground French drain that connects to the outfall that is inaccessible from the site (photo P8070017). I saw two catch basins on-site, one in the parking lot and the other at the very edge of the property upslope from the front side of the building

(Photo P8070023). Neither of these catch basins seemed appropriate for sampling due to location and likelihood of exposure to significant sources of pollution from the site.

The front of the building is where they load and unload materials. They regularly have tankers that offload latex and oil to large vats that are stored inside via outside valves. Ms. Dobbins said that the tankers have spill kits with them and that the buckets under the valves are there for occasional drips that come from the connection points (Photo P8070024 and P8070030).

The chemicals used in Gaco's manufacturing processes are stored adjacent to the valves used to re-supply the company with oil and latex. The large vats inside had secondary containment, but the various other containers of chemicals did not have secondary containment. Although Ms. Dobbins said there were spill kits available for spill response in this area, I did not observe any (Photo P8070031). I would recommend that this bay be fitted with a berm or better secondary containment for all the smaller buckets and barrels of chemicals.

During the time of inspection there were several empty chemical containers and barrels that were being stored outside waiting to be removed from the site (Photo P8070028). One of the large square containers had been cut open and was being used to store a botched chemical reaction that had created a useless glass-like material (Photo P8070029). I suggested that they provide a cover for this container as soon as possible to prevent the open container from collecting stormwater. Also stored outside were two decommissioned vats that Ms. Dobbins said they plan on removing from the site and a forklift and trailer currently used by the facility (Photo P8070027 and P8070033).

Section E: Compliance/Recommendations

- Please resume sampling for pH, zinc, copper, hardness, lead and nitrate/nitrite. You can suspend sampling for these parameters only after eight (8) consecutive quarterly samples demonstrate attainment of benchmark values for each parameter.
- Submit DMRs on a quarterly basis as required by condition S5.A of your permit. If there is not a rain event in a quarter you still must submit a DMR with an explanation as to why a sample was not taken. DMRs must be submitted to: **Water Quality Program P.O. Box 47696 Olympia WA 98504-7696.**
- Section S4.D of the permit requires visual monitoring of the facility on a quarterly basis, one of which needs to be a dry season inspection (dry season inspection to occur in July, August, or September after seven consecutive days of no rain). This inspection should be done by the person named in the Stormwater Pollution Prevention Plan (SWPPP). The results from the inspection should be summarized in a report or checklist and kept with the SWPPP.
- Please update the facility's Stormwater Pollution Prevention Plan to reflect current conditions.
- The container that is storing the substance that was formed from the botched chemical reaction needs to be covered immediately or stored indoors.
- Improve secondary containment around the chemicals stored in the bay shown in photo P8070031. For assistance see the Stormwater Management Manual for Western Washington which can be found at: <http://www.ecy.wa.gov/programs/wq/stormwater/index.html>.
- Monitor and cover machinery stored outdoors to make certain fluid leaks are not contaminating soils or stormwater.

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.


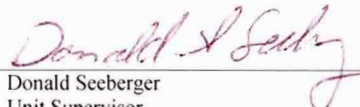
 Megan Wisdom Industrial/Construction Stormwater Inspector Water Quality Program	8/17/06 Date	Reviewed and approved by:  Donald Seeberger Unit Supervisor Water Quality Program	08/18/06 Date
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PHOTO ADDENDUM – GACO WESTERN 8/7/2006

P8070017 DESCRIPTION: BACK OF FACILITY WHERE UNDERGROUND FRENCH DRAIN IS LOCATED



P8070019 DESCRIPTION: ROOF DRAIN WHERE SAMPLES ARE COLLECTED



P8070023 DESCRIPTION: EMPLOYEE PARKING



P8070024 DESCRIPTION: FRONT OF FACILITY



P8070027 DESCRIPTION: MACHINERY STORAGE



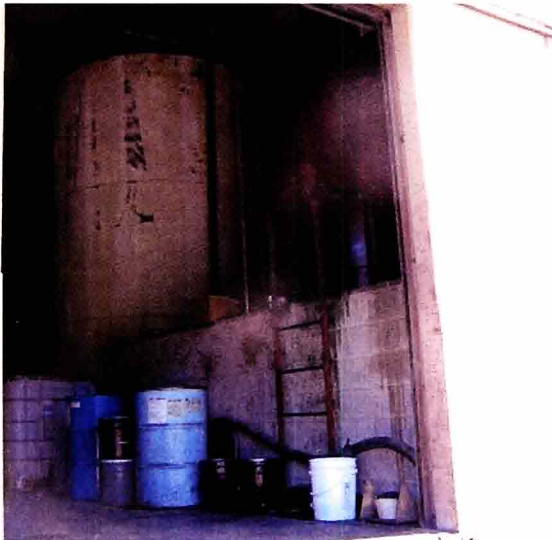
P8070028 DESCRIPTION: EMPTY CONTAINERS WILL BE HAULED OFF SITE

PHOTO ADDENDUM – GACO WESTERN 8/7/2006

P8070029 DESCRIPTION: BIN WITH MATERIAL FROM BOTCHED CHEMICAL REACTION



P8070030 DESCRIPTION: LATEX AND OIL OFFLOADED HERE, BUCKETS COLLECT OCCASIONAL DRIPS



P8070031 DESCRIPTION: INDOOR CHEMICAL STORAGE



P8070033 DESCRIPTION: OLD TANKS WILL BE HAULED OFF-SITE