



# Modification of Permit Coverage Form for Industrial Stormwater General Permit

Permit No. WAR-001530

**I. Operator/Permittee for the Facility** (All permit and billing correspondence will be mailed here)

Operator/Permittee's Name Peter Kropf		Phone No. 425-895-6743	Email Address peter.kropf@honeywell.com
Company Name Honeywell Aerospace			
Street Address or P.O. Box 15001 NE 36th Street			
City Redmond	State WA	Zip + 4 98052-5317	

**II. Modified Permit Information CHECK ALL THAT APPLY**

New Industrial Process (requires public notice), please list the associated SIC codes:

1		2		3		4		5	
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Type or Nature of New Industrial Activities: \_\_\_\_\_

Are there new monitoring points associated with the new industrial process?  No  Yes

If no, please list the previously established monitoring points associated with the new process (i.e. CB1, DP4):  
\_\_\_\_\_

If yes, please identify new monitoring points:

Discharge identifier. These cannot be symbols. (maximum of three characters ex. 01A)	Latitude degrees, minutes, seconds	Longitude degrees, minutes, seconds	Location description (i.e. Catch Basin 1)
	° ' N	° ' W	
	° ' N	° ' W	
	° ' N	° ' W	

If Applicable, New Receiving Water

Receiving Water Body	Latitude degrees, minutes, seconds	Longitude degrees, minutes, seconds
	° ' N	° ' W
	° ' N	° ' W

**What type of modification are you requesting?**

Level 2 / Level 3 Deadline Extension, please list the new deadline requested (MM/DD/YYYY): 6/30/2020

- Attach detailed technical basis for extension. Include proposed timeline for completion and describe issues that affect completion date; for example, state/local permits, study, design, financing, professional services and contracting, etc.

Level 2 / Level 3 Waiver. Attach technical basis for request.

- If request is based on claim that it is "not feasible" to perform corrective actions, provide detailed information to support request (e.g., lease, contract, affidavit, maps, photos, and/or other documentation).
- If request is based on claim that corrective action is "not necessary" to prevent violations of water quality standards, Ecology recommends including an engineering report and sampling information to support claim.

Other (please explain): \_\_\_\_\_

**III. Public Notice**

Facilities modifying existing coverage must publish a public notice at least once a week for **two** consecutive weeks with **seven** days in between publications, in a **single** newspaper of general circulation in the county in which the facility is located. Ecology cannot grant permit coverage sooner than the end of the 30-day public comment period, which begins on the date of the second public notice. Submit (or fax: 360-407-6426) the application to Ecology on or **before** the date of the first public notice. If you fax the application to Ecology, you must follow up with hard copy by mail.

Date of the first public notice: 5 / 3 / 2019  
 /Date of second public notice: 5 / 10 / 2019 (Begins 30-day public comment period)  
 Example: Date of the first public notice: 01 / 01 / 2010  
 Date of second public notice: 01 / 08 / 2010

Name of the newspaper that will publish the public notices: The Redmond Reporter

Complete this template using site-specific information. The **bold** language is required by WAC 173-226-130 and must be included in its entirety. (Either use the fill-in template below or attach on a separate sheet of paper, if necessary.)

**Type in name of applicant, Type in address of applicant is seeking modification of coverage under the Washington Department of Ecology's NPDES General Permit for Stormwater Discharges Associated with Industrial Activities at the industrial site, known as Type in site name located at Type in street address in Type in name of nearest city.**

**Activities requiring permit modification include Briefly describe the modification, i.e., adding the industrial process, requesting a waiver of level 2 or 3 corrective action.**

**Any person desiring to present their views to the Department of Ecology concerning this application may notify Ecology in writing within 30 days from the last date of publication of this notice. Comments may be submitted to:**

**Washington Dept of Ecology  
 Water Quality Program – Industrial Stormwater  
 PO Box 47696  
 Olympia, WA 98504-7696**

**IV. Certification of Permittee**

*"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*

Peter Kropf

Honeywell  
 Company

4/26/19

Printed Name

Date

Signature

4/30/19  
 Date

**\*Federal regulations require this application is signed by one of the following:**

- A. In the case of corporations, by a principal executive officer of at least the level of vice president.
- B. In the case of a partnership, by a general partner of a partnership.
- C. In the case of sole proprietorship, by the proprietor.
- D. In the case of a municipality, state, federal, or other public facility: by either a principal executive officer or ranking elected official.

Return this signed original document to the address below. Make sure you retain a copy for your records.

Washington Department of Ecology  
Water Quality Program – Industrial Stormwater  
PO Box 47696  
Olympia, WA 98504-7696

If you have any questions, please call:

- **Shawn Hopkins** 360-407-6442 or [shop461@ecy.wa.gov](mailto:shop461@ecy.wa.gov) for Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Skagit, Snohomish, Spokane, Stevens, Walla Walla, Whatcom, and Whitman counties.
- **Clay Keown** 360-407-6048 or [ckeo461@ecy.wa.gov](mailto:ckeo461@ecy.wa.gov) for Island, King (except Seattle), and San Juan counties.
- **Josh Klimek** 360-407-7451 or [jokl461@ecy.wa.gov](mailto:jokl461@ecy.wa.gov) for city of Seattle and Kitsap, Pierce, and Thurston counties
- **Joyce Smith** 360-407-6858 or [josm461@ecy.wa.gov](mailto:josm461@ecy.wa.gov) for Benton, Chelan, Clallam, Clark, Cowlitz, Douglas, Grays Harbor, Jefferson, Kittitas, Klickitat, Lewis, Mason Okanogan, Pacific, Skamania, Wahkiakum, and Yakima counties.

*To ask about the availability of this document in a version for the visually impaired call the Water Quality Program at 360-407-6600. Persons with hearing loss, call 711 for Washington Relay Service. Persons with a speech disability, call 877-833-6341.*

**To:** Mr. Clay Keown, *Washington Department of Ecology*

**From:** Christine Nancarrow, MS, QISP, CESCL, *Pacific Stormwater*

**Date:** April 9, 2019

**Subject:** **Technical Basis for Level 3 Deadline Extension Request Permit No. WAR001530**

**Mr. Keown,**

Please find a technical basis to support the Level 3 deadline extension request submitted by Honeywell, located at 15001 NE 36<sup>th</sup> Street in Redmond, Washington for industrial stormwater permit number WAR001530.

Despite achieving sitewide, consistent attainment for all permitted industrial benchmarks in the first quarter of 2015, the Honeywell Redmond facility underwent a significant process change in August of 2017 as a result of their divestiture of Building 2. This change in leasehold resulted in a modification of the property boundary, activation of three new sampling locations (CB08, MH08, and MH14), as well as the consolidation of industrial activities in, and the expansion of, Building 3. The Building 3 expansion in 2017 brought a number of construction projects and pieces of new equipment to the Site. Increased turbidity and metals were observed as construction activity increased, with declining detections observed as construction activity decreased.

In early 2018 as construction reached completion, elevated copper in stormwater was observed in the centrally located sample, MH14. In response, Honeywell conducted a post-construction site investigation for potential copper sources which included multiple video surveys within the MH14 drainage basin. As we discussed with you on December 4, 2018, accumulated solids and multiple, structurally compromised, below-grade stormwater conveyance lines in the upgradient portion of the MH14 drainage basin were observed:

- The observed, compromised conduit has been documented in both shallow PVC and deep concrete piping located between the Building 3 rooftop and downgradient MH14. A majority



of the current MH14 drainage basin consists of permeable surface (lawn and landscaping). The remaining surfaces within the drainage basin consist of concrete walkways between buildings and building rooftops, which house industrial rooftop equipment such as air handling units (AHU) and heating, ventilation and air conditioning (HVAC) systems.

- The accumulated solids observed within the MH14 drainage system were collected on May 31, 2018 and submitted to a Washington State certified analytical laboratory for toxicity characteristic leaching procedure (TCLP) analysis. Analytical results documented elevated copper (69 ug/L) in leachate generated from solids collected, attributing a source of elevated copper detections in MH14 stormwater to solids found within the conveyance system.

### **Proposed Corrective Actions:**

Corrective actions to mitigate the elevated copper detections observed in MH14 stormwater discharge are proposed as part of a 2019 Honeywell Clean Room Expansion Capital Project permitted through the City of Redmond. Construction is slated to begin mid-April 2019 (pending permits) and should be completed by Spring 2020.

- 1) Level 2 Corrective Action: The compromised piping will be replaced prior to installation of the new building footings, tentatively early summer of 2019. In the interim, an additional source assessment investigation is currently underway to ensure other potential copper sources are mitigated prior to the next phase of site construction.
- 2) Level 3 Corrective Action: A bioretention basin will be installed to mitigate approximately 5,600 square feet of Building 3 rooftop. A subset of hyperaccumulating plant species have been specified for installation into the bioretention basin to promote metals removal. Further, extensive testing is planned to verify proposed bioretention construction materials (mulch, compost, etc) prior to installation to ensure the reduction, rather than introduction, of metals in stormwater discharging from the basin.