



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 • Olympia, Washington 98504-7775 • 360-407-6300
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February 19, 2020

Eric Rothermel
MI Windows and Doors LLC
650 West Market Street
Gratz, PA 17030

Re: NPDES Permit Number WAR000074

Dear Eric Rothermel:

Enclosed is a report from the Department of Ecology's recent National Pollutant Discharge Elimination System (NPDES) Industrial Stormwater General Permit (ISGP) compliance inspection conducted at your facility on January 24, 2020. Thank you for the time your personnel spent with me during my visit.

Please contact me at honor.carpenter@ecy.wa.gov or (360) 407-6273 if you have any questions, comments or would like additional technical assistance.

Sincerely,

Honor Carpenter
Industrial Stormwater Facility Manager
Southwest Regional Office
Water Quality Program

Enclosures: Industrial Stormwater Inspection Reports
Photo Log

cc: Dave Buffelen, Milgard
Kendra Henderson, Ecology
Clay Keown, Ecology





Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Cod	NPDES	yr/mo/dy	Inspection Type	Inspector	Facility Type															
1 N	5	WAR000074	2020 01 24	0 C	S	2														
Remarks																				
21										66										
Inspection Work Days										Facility Self-Monitoring Evaluation Rating	B1	QA	-----Reserved-----							
67										69	70	71	72	73	74	75				80

Section B: Facility Data

Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>)	Entry Time/Date	Permit Effective Date
Milgard Essence and Woodclad 910 54th Avenue East Fife, WA 98424	11:45 hours 01/24/2020	January 1, 2020
	Exit Time/Date	Permit Expiration Date
	12:45 hours 01/24/2020	December 31, 2024
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number Dave Buffelen, Environmental Health & Safety Manager Phone: (253) 926- 7788 Email: Dave.Buffelen@Milgard.com	Other Facility Data (<i>e.g., SIC NAICS, and other description information</i>) This facility occupies 7.8 acres. It was formerly known as the Milgard MFG Fiberglass Division	
Name, Address of Responsible Official/Title/Phone and Fax Number Eric Rothermel MI Windows and Doors LLC 650 West Market Street Gratz, PA 17030 Phone: (717) 365-3300 Email: Eric.rothermel@miwd.com	Standard Industry Code (SIC): 3089, Plastics Products NEC; 3281, Cut Stone and Stone Products. North American Industry Classification System (NAICS): 326199, All Other Plastics Products Manufacturing; 327991, Cut Stone and Stone Product Manufacturing	
Contacted <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

Section C: Areas Evaluated During Inspection (*Check only those areas evaluated*)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Stormwater	
<input type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

WAR000074 authorizes Milgard Windows Essence and Woodclad (Milgard) to discharge stormwater and conditionally approved non-stormwater to surface waters of the state and storm systems that drain to surface waters of the state, under the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) Industrial Stormwater General Permit (ISGP).

I met with Dave Buffelen, Milgard's Environmental Health & Safety Specialist upon arrival. Dave Buffelen said that Milgard was recently purchased by MI Windows and Doors LLC and ISGP coverage was transferred, effective December 20, 2019. There are five Milgard facilities in Pierce county with (separate) NPDES ISGP authorizations to discharge. Dave Buffelen said he has worked for Milgard for over a decade (at a different facility) and he said he plans to continue to work for MI Windows and Doors LLC in his role as Environmental Health & Safety Manager. I told Dave Buffelen that the inspection was a routine compliance inspection and would consist of a physical walk around the outside of the facility and a review of paperwork that ISGP condition S9 (S9) requires permittees to maintain onsite. We reviewed paperwork first, then conducted our site walk. We discussed the project while we walked the site

S3. – Stormwater Pollution Prevention Plan (SWPPP) – The SWPPP was available for review and was most recently certified on January 6, 2020, in accordance with (ISGP) S3.A.6. Dave Buffelen stated that Milgard/ MI Windows and Doors LLC had the SWPPPs for their facilities revised to comply with changes in the 2020 ISGP.

Dave Buffelen stated that Milgard employs an outside company, EnCo Environmental Corporation, to conduct site inspections and maintain best management practices (BMPs) in top performance condition. He said that Milgard devotes a significant amount of time to source control and improving practices at the site to minimize potential pollution.

S4. – Correct Sampling Procedures and Locations – Compliance samples are collected from one monitoring location, identified as Stormwater FG2. There are approximately ten catch basins that convey stormwater from three main, similar storm lines that discharge to approximately five outfalls, four on the west side of the site, one on the north side. Outfalls on the north side of the facility discharge to the Fife ditch, which discharges to Wapato creek; outfalls on the west side of the facility discharge directly Wapato creek,

which drains to the Hylebos Waterway, a Puget Sound Sediment Cleanup Site. The compliance sampling location appears to allow for collection of a representative sample.

S5. – Compliance with Benchmark Values – There was one Level 1 exceedance of the total zinc benchmark in 2019 and two Level 1 exceedances of the total copper and total zinc benchmarks in 2018.

S6. Discharge to Impaired Waters- The Fife ditch segment (assessment unit ID 17110019020821) and Wapato creek segment to which Milgard discharges are listed as Category 5 waters; they are impaired for low dissolved oxygen and high total ammonia. Because the discharge enters a 303(d) listed waterbody, ISGP S6.C requires Milgard to conduct additional monitoring for ammonia and fecal coliform (Table 6, S6).

Because Milgard's discharge enters a Puget Sound Sediment Cleanup Site, ISGP S6.C requires Milgard to jet their storm system once during the permit cycle (S6.C.2.d); and sample storm drain solids once during the permit cycle (S6.C.2.e).

Samples are collected by EnCo Environmental Corporation and analyzed by Test America.

S7. – Monthly Inspections – EnCo Environmental Corporation (Jonathan M. Kemp) conducts monthly inspections. Dave Buffelen reviews EnCo Environmental Corporation's completed reports and signs them after he approves them. Completed reports were filed in the SWPPP and available for review. The inspection reports reviewed were well organized and extremely detailed. The reports assessed each of the BMPs implemented on the 7.8-acre site in detail. The reports provided an excellent snapshot of conditions on the day of inspection and identified specific future actions to be taken to stay in compliance with the ISGP.

S8. – Corrective Actions –Level 1 Corrective Actions that were completed in response to the two Level 1 Corrective Actions triggered in 2018 were clearly documented in Milgard's 2018 Annual Report. Five operational BMPs and one treatment BMP were discussed in the Annual Report, which identified another eighteen BMPs, including operational, structural and treatment BMPs that are planned or scheduled for future implementation. A few of the BMPs documented in the 2018 Annual Report were steel frame catch basin inserts were installed in all catch basins; sweeping and vacuuming frequencies were substantially increased and storage of materials was revised to minimize exposure of stormwater to pollutants.

S9. – Reporting and Recordkeeping – The paperwork that was requested was provided and appeared to be complete. Documents reviewed included:

Discharge Monitoring Reports (S9.B)

Annual Reports (S9.C)

Inspection reports (S7.C.1)

Copy of ISGP (S9.D.1.a)

ISGP coverage letter (S9.D.1.b)

Requirements:

Follow the terms and conditions of the ISGP.

- ☐ Unannounced
☒ Announced



Name and Signature of Inspector	Agency/ Office Number	Date:
Honor Carpenter 	Ecology/SWRO (360) 407-6273	02/10/2020
Signature of Management QA Reviewer	Agency/ Office Number	Date:
Steven G. Eberl, P. E. 	Ecology/SWRO (360) 407-6293	2-14-2020

Image Log

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Image 1: Roofed sheds are used to protect materials and equipment from stormwater.



Image 2: Materials stored under cover.



Image 3: Dumpsters are lidded and located as far from storm system as possible.



Image 4: Lidded dumpster is stored under a roofed area.



Image 5: Marker helps identify submerged catch basin next to outfall.



Image 6. Outfall.



Image Log

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[illegible]

Permit #WAR000074
January 24, 2020

Inspector: Honor Carpenter
Camera: iPhone 7

Image Log

Page 3 of 3

Image 6: Receipt for \$12,048.44 for catch basin and lateral line cleaning (line jetting) and other BMP maintenance and installation. The ISGP requires permittees to jet storm lines once per permit cycle. Milgard contracted the cleaning of their catch basins and lateral lines cleaned on December 30, 2019, before the 2015 ISGP expired.

EnCO
Environmental Corporation

December, 2019

Remediation
Habitat

Invoice

BILL TO
Mr. Dave Buffelen
Milgard Windows & Doors
854th Avenue East
Tacoma WA 98424

TERMS	DUE DATE	PROJECT MNGR.	ENCO JOB #	
Net 10	1/9/2020	JMK	STJK_MilgardVactor_1	

DESCRIPTION	QTY	RATE	ITEM	AMOUNT
PO #0520327TAC Catch basin and lateral line cleaning and basin filters and installation				
Vacuum Basin/Pipe/Water & Sludge Disposal (includes tax)	7,573.45	1.00	FEE105-OTH	7,573.45
Inserts for Basins (includes tax/ship/handle)	1,512.99	1.00	FEE105-OTH	1,512.99
Project Manager - Installation and coordination	2,962	1.00	FEE101JK-REG	2,962.00
Total				\$12,048.44
Balance Due				\$12,048.44

Remit To: P.O. Box 1236, Gig Harbor WA 98335 Office: 253.841.9710