



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

*PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341*

September 27, 2021

Emmett Boyle  
Silver Cloud Inns and Hotels  
103 118th Avenue SE  
Suite 300  
Bellevue, WA 98005

Re: National Pollutant Discharge Elimination System (NPDES) Permit No. WA0041084  
Inspection Report

Dear Emmett Boyle:

Thank you for your time during our inspection of your facility on September 2, 2021 in Tacoma, WA. I am sending you a copy of our inspection report in reference to your NPDES Permit (No. WA0041084) for your review and files.

If you have any questions regarding this inspection report, please contact me via email at [john.diamant@ecy.wa.gov](mailto:john.diamant@ecy.wa.gov), or by phone at (360) 407-6289. Thank you very much.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Y. Diamant".

John Y. Diamant, P.E.  
South Puget Sound Basin  
Industrial Facility Manager  
Southwest Regional Office  
Water Quality Program

Enclosures: NPDES Permit No. WA0041084 Inspection Report  
2021-09-02 Inspection Photolog

cc: Steve Eberl, Ecology  
Marc Pacifico, Ecology

# Water Compliance Inspection Report

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

Transaction Code		NPDES										yr/mo/dy		Inspection Type		Inspector		Facility Type			
1	N	5	W	A	0	0	4	1	0	8	4	2	1	0	9	0	2	C	S	2	
Remarks																					
21																				66	
Inspection Work Days			Facility Self-Monitoring Evaluation Rating								B1		QA		-----Reserved-----						
67	1	69	70								3	71	N	72	N	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> Silver Cloud Inn 2317 North Ruston Way Tacoma, WA 98402	Entry Time/Date 11:58 hours 9/2/2021	Permit Effective Date February 1, 2014
	Exit Time/Date 13:05 hours 9/2/2021	Permit Expiration Date January 31, 2019
	Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number Emmett Boyle Director of Assets ph: (425) 637-9800  Tim Ramey Chief Engineer ph: (253) 272-1300	
Name, Address of Responsible Official/Title/Phone and Fax Number  <div style="text-align: right;">           Contacted  <input checked="" type="checkbox"/> Yes   <input type="checkbox"/> No         </div> Mr. Emmett Boyle (as shown above)		

## 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 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)*

## Summary of Findings

Department of Ecology (Ecology) permit manager [John Diamant (SWRO-WQP)] entered the facility for a compliance inspection at 11:58 hours. The weather was sunny. John Diamant met Tim Ramey and Emmett Boyle at the front door. A quick sit-down meeting occurred in the front lounge. John Diamant mentioned the submittal of late Discharge Monitoring Reports (DMRs). Emmett Boyle said they now have dedicated staff to work on it and want to begin submitting DMRs online. John Diamant stated that online DMR submittals would be required after the permit is renewed.

We then went over some of the recent data from the hottest periods of the year, when they exceeded the permit limitation. They have had trouble meeting the ceiling permit limit and asked if anything could be done to help them get into compliance. John Diamant stated he could consider changing or modifying the condition of the limit when the permit is renewed. He stated that maybe the limit could be conditioned to apply to the four-hour, rolling average maximum daily temperature. Emmett Boyle stated that this would help cover most of the periods when there is high occupancy during the hottest days of the year. Emmett Boyle also stated that they may be able to make their mixing more efficient by utilizing more efficient mixing valves with their intake water.

We then looked at the mixing valve system in the Mixing Valve/Control Room and looked outside at the pumps, vault, intake, and discharge locations. Everything looked good and in working order. Some corrosion was noted in the Mixing Valve/Control Room.

It should be noted that Silver Cloud Inn is using an innovative way to conserve energy and water for their cooling system. They are trying to be environmentally conscious. Ecology had originally set a ceiling temperature limit even though there may be more dilution available for their discharge. It is unlikely the reported high temperature values in the effluent have resulted in an actual exceedance of temperature standards. Ecology will look into this issue more closely to see what can be done when the permit is renewed.

The site visit ended at 13:05 hours.

#### Recommended Actions

- Ecology will: 1) forward a copy of this inspection report to Silver Cloud Inns and Hotels for their review and files; and 2) Ecology will work on how to modify the temperature limit for the permit reissuance.
- Silver Cloud Inns and Hotels must: 1) continue to submit Discharge Monitoring Reports on time; and 2) notify Ecology of any permit noncompliance issues.

#### Verify Latitude and Longitude

☒ Announced  
☐ Unannounced

Main Office (front door)

Lat (47.27701° N) and Long (122.46776° W)

Outfall 001

Lat (47.27744° N) and Long (122.46759° W)

Name(s) and Signature(s) of Inspector(s)

John Y. Diamant, P.E.

Agency/Office/Phone and Fax Numbers

Ecology/SWRO (360) 407-6289

Date

9/27/2021

Signature of Management QA Reviewer

Steven G. Eberl, P.E.

Agency/Office/Phone and Fax numbers

Ecology/SWRO (360) 407-6293

Date

9/27/2021

## INSTRUCTIONS

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

**Column 1: Transaction Code:** Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

**Column 3 - 11: NPDES Permit No.:** Enter the facility's NPDES permit number – third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

**Columns 12 - 17: Inspection Date:** Insert the date entry was made into the facility. Use the year/month/day format (e.g., 94/06/30 = June 30, 1994).

**Column 18: Inspection Type\*:** Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge – Biosolids	{	Stormwater-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Stormwater-Construction-Non-Sampling
F	Pretreatment Follow-up	\$	Combined Sewer Overflow-Non-Sampling	:	Stormwater-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Stormwater-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Stormwater-MS4-Sampling
M	Multimedia	\	CAFO-Sampling	-	Stormwater-MS4-Non-Sampling
N	Spill	=	CAFO-Non-Sampling	>	Stormwater-MS4-Audit
O	Compliance Evaluation (Oversight)	2	IU Sampling Inspection		
P	Pretreatment Compliance Inspection	3	IU Non-Sampling Inspection		
R	Reconnaissance	4	IU Toxics Inspections		
S	Compliance Sampling	5	IU Sampling Inspection With Pretreatment		
		6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics With Pretreatment		

P

**Column 19: Inspector Code:** Use one of the codes listed below to describe the *lead agency* in the inspection

A - State (Contractor)	O - Other Inspectors, Federal/EPA (Specify in Remarks columns)
B - EPA (Contractor)	P - Other Inspectors, State (Specify in Remarks columns)
E - Corps of Engineers	R - EPA Regional Inspector
J - Joint EPA/State Inspectors-EPA Lead	S - State Inspector
L - Local Health Department (State)	T - Joint State/EPA Inspectors-State Lead
N - NEIC Inspectors	

**Column 20: Facility Type:** Use one of the codes below to describe the facility.

- 1 - Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 - Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 - Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 - Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 - Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389

**Columns 21-66: Remarks:** These columns are reserved for remarks at the discretion of the Region.

**Columns 67-69: Inspection Work Days:** Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

**Column 70: Facility Evaluation Rating:** Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

**Column 71: Biomonitoring Information:** Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

**Column 72: Quality Assurance Data Inspection:** Enter Q if the inspection was conducted as follow-up on quality assurance sample results. Enter N otherwise.

**Columns 73-80:** These columns are reserved for regionally defined information.

### Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, and other updates to the record).

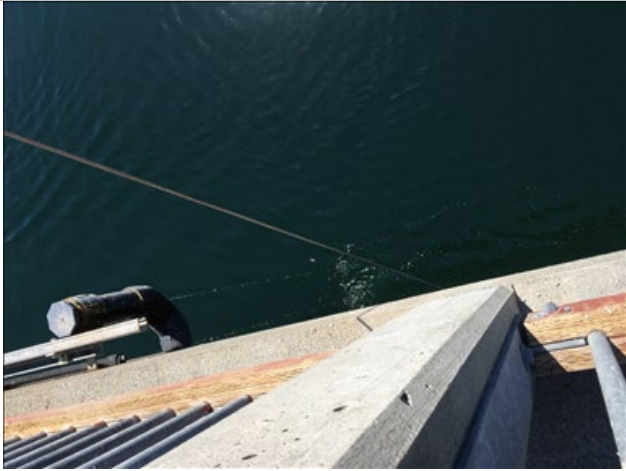

### Section C: Areas Evaluated During Inspection



Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

### Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

\*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K-CAFO, V-SSO, Y-COS, W-Stormwater, 9-MS4. States may also use the new wet weather CAFO and MS4 inspection types shown in column 19 of this form. The EPA regions are required to use the new wet weather CAFO and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

Description	Photographs	Image Name
Location of intake pump.	 <a href="#">Ctrl+Click HERE to view full size image</a>	SILVER CLOUD INN
	 <a href="#">Ctrl+Click HERE to view full size image</a>	SILVER CLOUD INN

<p>Discharge underwater releasing bubbles.</p>	 <p><a href="#">Ctrl+Click HERE to view full size image</a></p>	<p>SILVER CLOUD INN</p>
<p>Location of discharge pipe.</p>	 <p><a href="#">Ctrl+Click HERE to view full size image</a></p>	<p>SILVER CLOUD INN</p>

	 A photograph showing a concrete structure with a metal railing and a white pipe running along the edge of a body of water. The pipe is connected to a larger structure, possibly a building or a dock. The water is dark and still. In the background, there are trees and a hillside.	SILVER CLOUD INN
Intake and discharge piping.	 A photograph showing a concrete structure with a metal railing and a white pipe running along the edge of a body of water. The pipe is connected to a larger structure, possibly a building or a dock. The water is dark and still. In the background, there are trees and a hillside.	SILVER CLOUD INN



Vault pumps.



SILVER  
CLOUD INN

[Ctrl+Click HERE to view full size image](#)

Pump vaults.



SILVER  
CLOUD INN

[Ctrl+Click HERE to view full size image](#)

Outside flow meter.



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CLOUD INN

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	 <p><a href="#">Ctrl+Click HERE to view full size image</a></p>	SILVER CLOUD INN
Heat exchanger/valve control room.	 <p><a href="#">Ctrl+Click HERE to view full size image</a></p>	SILVER CLOUD INN