



State of Washington Department of Ecology
Northwest Regional Office

STORMWATER COMPLIANCE INSPECTION REPORT

General Data

| Inspection Date | NPDES Permit # | County | Receiving Waters | Inspector(s) | Fac Type |
|-----------------|----------------|-----------|----------------------------------|--------------|------------|
| 12/17/2021 | N/A | Snohomish | N/A – Infiltrates to groundwater | Rose Propst | Industrial |

Standard Industrial Code: 331512, Steel Investment Foundries

Weather at time of inspection: Partly cloudy

Discharges to: Surface Water ☐ Ground Water ☒

Facility Data

| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
|---|------------|------------------------|
| SeaCast Arlington LLC 18410 63 rd Ave NE Arlington, WA 98223 | 10:20 AM | N/A |
| | Exit Time | Permit Expiration Date |
| | 11:45 AM | N/A |

| Name(s) of On-Site Representative(s)/Title(s)/Phone | Additional Participants: |
|--|--------------------------|
| Dave Robins (206) 276-5621 Facility Operations | |

| Mailing Address of Responsible Official/Title/Phone | Samples Taken? No |
|--|-------------------------------------|
| Bert Robins 6130 31 st Ave NE Tulalip, WA 98271 | Photos Taken*? Yes |
| Announced Inspection: No | *Photographs available upon request |

CONCERNS AND RECOMMENDATIONS

After evaluating onsite conditions and outdoor process machinery, the Site does not meet all conditions listed in Section 1.F of the ISGP and is therefore not eligible for the ISGP Conditional No Exposure (CNE) provision; therefore I have denied your CNE application. A letter will be sent confirming that your application has been denied. As a site with a discharge point to groundwater, the terms and conditions of the ISGP still apply (S.1.E.1). Please apply for permit coverage within the next two weeks (by Monday February 14) by going to the link below, expanding the "Apply" bar, and filling out the Notice of Intent.

<https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Industrial-stormwater-permit#Apply>

The infiltration trenches with perforated pipe are considered to be Type V injection wells as regulated under the Underground Injection Control (UIC) Program. Please ensure these trenches are registered with the UIC. Additional information about the UIC program can be found here:

<https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Underground-injection-control-program/Register-UIC-wells-online>. Questions regarding the UIC registration can be directed to UICwells@ecy.wa.gov.

BACKGROUND

This facility is currently not covered under the Industrial Stormwater General Permit (Permit). The purpose of this inspection was to determine if this facility qualifies for a Conditional No Exposure certificate by meeting the eleven conditions listed in permit condition S1.F.

Per communication with Mr. Jerry Caslin, stormwater from this facility is not discharged offsite but rather infiltrates to groundwater through several subsurface infiltration trenches with perforated pipe. The Stormwater Management Report for the Site indicates "In the event that onsite drainage systems are overwhelmed by excessive rainfall, the stormwater will continue to stay onsite due to the topography of the site. Stormwater will not leave the site nor back up into the buildings." Therefore, stormwater also does not bypass or overflow offsite.

Permit condition S1.F Requirements Evaluated

If any of the questions below are answered "Yes" the facility is not eligible for CNE exemption.

Is anyone using, storing or cleaning industrial machinery or equipment in an area that is exposed to precipitation, or is there an exposed area where residue remains from using, storing or cleaning industrial machinery or equipment? **Yes**

Are materials or products on the ground or in storm water outlets from spills/leaks? **Yes**

Are materials or products from past industrial activity exposed to rain or snow? **No**

Is material handling equipment (except adequately maintained vehicles) that moves, lifts, or transports materials (such as a forklift) exposed to rain or snow? **No**

Are materials or products exposed to precipitation during loading /unloading or transporting activities? **No**

Are materials or products stored outdoors (except final product intended for outside use, e.g. new cars, where exposure to storm water does not result in discharge of pollutants)? **Yes**

Are materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers? **No**

Are materials or products handled or stored on roads or railways owned or maintained by the discharger? **No**

Is waste material exposed to precipitation (except waste in covered, non-leaking containers e.g. dumpsters)? **Yes**

Does the application or disposal or process wastewater occur (unless otherwise permitted)? **No**

Is there particulate matter or visible deposits of residuals from roof stakes/vents not otherwise regulated, i.e., under an air quality control permit, and evident in the storm water outflow? **Yes**

Inspection Comments

I observed outdoor process machinery (chillers and a generator) and materials (liquefied argon and nitrogen) which are exposed to precipitation. Additionally, significant tire tracking was observed within the truck dock near two catch basins. These items indicate the facility is not eligible for the CNE.

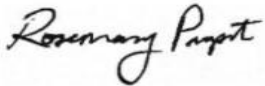
During the inspection, I noticed the following items that need to be evaluated in accordance with the ISGP:

- No canopies or seals were observed around the dock-high doors in the truck dock. Canopies or seals ensure materials being offloaded and the equipment doing the offloading (forklifts, etc.) are not exposed to precipitation during offloading.
- Significant tire marks were observed in the truck well. Tire dust can contain zinc and other pollutants. Regular use of a vacuum sweeper can significantly decrease residual tire dust on pavement. No catch basin inserts were observed in these catch basins, but were observed in the other catch basins onsite.
- A covered roll-off bin was observed dripping liquid which was running down the driveway slope to a catch basin. When the interior of the bin was inspected, contents included a 55-gallon drum and apparent scrap metal. Standing liquid was observed in the bin and appeared to be leaking from the bin to the pavement below, causing the residue stream. Bins should be covered at all times except when in immediate use.
- One small oil sheen was observed in the southern driveway near a storm drain, and a sheen was observed in the catch basin into which water leaking from the scrap metal bin was flowing. Catch basins and inserts should be inspected on a regular basis and maintained in accordance with (or, if necessary, more frequently than specified by) manufacturer guidelines. SeaCast should log any fuel/oil/material spills and immediately address them using onsite spill kits. Spill kits are required to be placed near areas where fueling or fuel transfer may occur (e.g. generator). No exterior spill kits were observed.
- Drainage drawings indicate one or more catch basins are equipped with oil/water separators (OWS). OWS should be regularly cleaned and maintained and the tenant should keep maintenance logs and

sludge disposal receipts.

For questions concerning this inspection report please contact Rose Propst at (206) 213-9155 or Washington State Department of Ecology, NWRO (206) 594-0000.

Signatures



2/3/2022

Rose Propst
Industrial Stormwater Inspector
Water Quality Program

Date

Reviewed and approved by:
Signed Electronically Due to COVID-19

Amy Jankowiak
02/02/2022

Amy Jankowiak
Compliance and Technical Assistance Unit Supervisor
Water Quality Program

Date