

	STORMWATER COMPLIANCE INSPECTION REPORT				WADOE Stormwater Compliance Inspection Form										
	State of Washington Department of Ecology 15700 Dayton Avenue N., Shoreline, WA 98133				Phone: (206) 594-0000										
Section A: General															
Inspection Date: 4/5/2022	NPDES Permit #: WAR310172	County: King	Receiving Waters: Snoqualmie Mill Wetland	Inspector(s): Dennis Lee	Facility Type: Industrial										
Discharges to: Surface Water <input checked="" type="checkbox"/> Ground Water <input type="checkbox"/>				ANNOUNCED Inspection											
Section B: Facility															
Name and Location of Site Inspected			Entry Time	Permit Effective Date											
Snoqualmie Mill Industrial Areas			9:59 am	04/26/2021											
SE Stearns Rd & SE Haul Rd			Exit Time	Permit Expiration Date											
Snoqualmie, WA 98065			11:34 am	12/31/2024											
On-Site Representative(s): Name(s) / Title(s) / Contact number(s) or E-mail				Additional Participants:											
Mac McInnis 425-442-6002				Ashley Baldwin (Encore Environmental)											
Responsible Official(s)															
Tom Sroufe 249 Main Ave S Ste 107 North Bend, WA 98045 Phone: 425-444-0822		Mac McInnis 249 Main Ave S Ste 107 North Bend, WA 98045 Phone: 425-442-6002		<table style="width: 100%; border: none;"> <tr> <td></td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td>Samples Taken?</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> <tr> <td>Photos Taken?</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><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"/>
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Section C: Summary of Findings / Comments															
<u>BACKGROUND</u>															
<p>Snoqualmie Mill Industrial Areas ("Snoqualmie Mill", "Facility") is covered under Ecology's Industrial Stormwater General Permit (ISGP) #WAR310172. Ecology's stormwater unit has not conducted an inspection at this industrial site in the past. The property cover 18.7 acres and consists of (4) businesses: Flatiron, North Fork, Merrill & Ring, and Hos Bros Construction. The site is currently going through cleanup efforts due to contamination in soil and groundwater from past industrial activities. The purpose of this inspection is to conduct a compliance inspection and to provide technical assistance as appropriate.</p>															
<u>INSPECTION / OBSERVATIONS</u>															
<p>Upon arrival, Ecology Inspector Dennis Lee ("Inspector") met Mac McInnis from Snoqualmie Mill Ventures and the property's consultant, Ashley Baldwin from Encore Environmental. The inspection started with a review of documents followed with a visual inspection, then ended with a closing meeting summarizing all findings.</p>															
<u>Documents Review</u>															
<ul style="list-style-type: none"> • Current ISGP: A copy of the current permit version was not available at the time of inspection. The Inspector informed both Mac and Ashley that a current version of the permit should be available with the SWPPP. • Stormwater Pollution Prevention Plan (SWPPP): Facility's SWPPP was available at the time of inspection. <ul style="list-style-type: none"> - <u>Site Map:</u> A site map was available at the time of inspection. - <u>Facility Assessment:</u> An assessment of the facility's industrial activity, materials inventory, and associated pollutants were included. - <u>Best Management Practices (BMPs):</u> The SWPPP included BMPs conducted onsite. - <u>Pollution Prevent Team:</u> Staff were identified name/title and included their responsibilities. - <u>Sampling Plan:</u> The SWPPP includes a sampling plan with all items required by the Permit. • BMP and Maintenance Records: BMP / Maintenance records were not available at the time of inspection. Mac informed the Inspector that BMP/Maintenance is done by the tenants, thus they do not have any records. The Inspector informed Mac that as the Permittee, the facility will need to start acquiring records/invoices from the tenants and retain them for a minimum of (5) years as specified in the Permit. • Monthly Inspection Reports: Inspection reports dating back from September 2021 were available at the time of inspection. • Employee Training Records: Annual training logs were not available at the time of inspection. Ashley informed the Inspector that training was conducted but a log of attendees was not done and will be done moving forward. 															

- **Discharge Monitoring Reports (DMRs) & Sampling Analysis Records:** DMRs and laboratory results (OnSite Environmental) were available at the time of inspection.

Facility Inspection

- **Flatiron**
 - **Outdoor Materials and Equipment Storage:** The Inspector observed containers, wooden beams, steel beams, large steel pipes, and other materials stored outdoors (Photos 01-08). While covering large items and materials may be difficult, items in wooden crates should be covered.
 - **Dumpster without Lid:** A dumpster without a lid was observed (Photos 09-10).
- **Merrill & Ring and North Fork**
 - **Catch Basins:** The Inspector observed catch basins (Photo 11) at this section of the property and when inquiring about them with Mac and Ashley, the Inspector was told that the site plans to close the catch basins. Mac and Ashley noted that the system is so old that it completed degraded. The facility attempted to clean the system with a vacuum truck but only dirt/soil appeared to be in the system.
 - **Drums and Other Hazardous Fluids without Secondary Containment:** Multiple drums and containers (chemicals, gasoline) were observed without secondary containment inside the maintenance shop (Photos 12-15).
 - **Fueling Station with No Drip Pans:** Fueling stations were observed with no drip pans (Photo 16).
 - **Log, Bark, Firewood Storage Yard:** The Inspector observed the storage yard for logs, bark, and firewood (Photos 17-19). The Inspector noticed black-colored water on the ground (Photo 20) and noticed black liquid leaking out of a dumpster (Photos 21-22). Upon observing the contents of the dumpster, the Inspector found bark (Photos 23-24). It is possible that the liquid leaking out of the dumpster is leachate.
 - **Oil Sheen:** The Inspector observed an oil sheen (Photo 25).
- **Hos Bros Construction**
 - **Diesel Fueling Station and Oil Sheen:** A diesel fueling station was observed under cover and within secondary containment at the middle of Hos Bros' property (Photo 26). However, no drips pans were observed and an oil sheen was observed near the fueling station (Photos 27-28). Additional fuel tanks were observed at the east side of Hos Bros' property (Photo 29) – no drip pans were observed.
 - **Spill Kit:** A spill kit was observed next to the fueling station but it did not contain a non-metallic shovel (Photos 30-31). The Inspector informed both Mac and Ashley that all spill kits must have non-metallic shovels, especially when the facility operates on dirt/gravel ground.
 - **Chemical and Oil Storage without Secondary Containment:** Numerous drums and containers were observed without secondary containment inside the shop building (Photos 32-36). Although the items were under cover, the building is old and the floor is a mix of impervious ground and dirt/gravel ground. Upon exiting the building (northwest side of the building), the Inspector observed more drums and totes (used oil) directly next to the building without cover and without secondary containment. The Inspector also observed water in the ditch next to the drums/totes (Photos 37-38).
 - **Residue Stained Ground:** The Inspector observed black residue stains on the ground coming from a hose connected to a container (Photos 39-40).
 - **Turbidity Issue:** The facility triggered a Level 1 Corrective Action for turbidity in 2021. The facility believes that the source of turbidity came from the Hos Bros property and installed silt fences and straw wattles along the rock-lined ditch that runs through the property (Photo 41-42). The end of the rock-lined ditch is connected via culvert to a vegetated ditch. Upon looking at the vegetated ditch, the Inspector observed highly turbid water (Photo 43). Water from this ditch is connected to another ditch via culvert, which ultimately discharges off its property. Ashley informed the Inspector that they plan to reline the entire ditch and clean out the pipes/culverts in hopes to address the turbidity issue. The facility plans to do this during the dry months as the pipes are currently submerged in water.
- **Sample Points:** The Inspector observed sample location 01 (Photo 44) and sample location 02 (Photo 45). The Inspector notified Mac and Ashley that due to the sample point being submerged in water, sampling from this point as it currently

stands is of concern because any samples taken would be commingled with water already present in the swale. The facility will need to address the commingling issue at sample location 02.

Closing Meeting

The following items were discussed with Mac McInnis and Ashley Baldwin at the end of the inspection:

- Facility needs to start acquiring and retaining BMP / maintenance records from tenants.
- Facility needs to keep logs for annual trainings.
- Facility needs to add storm-resistant lids to dumpsters.
- Facility needs to locate and utilize drip pans at diesel fueling stations.
- Facility needs to clean up oil sheens.
- Facility needs to add secondary containment for all drums, totes, containers.
- Facility needs to have non-metallic shovels in spill kits.
- Facility needs to address commingling issue at sample location 02.

Section D: Compliance / Recommendations

- **VIOLATION and CORRECTIVE ACTION:** Facility does have secondary containment for drums, totes, and containers containment hazardous liquids and needs to contain as specified in the Permit. **Snoqualmie Mill has (30) calendar days to complete.**

Permit Condition: In accordance to **permit condition S3.B.4.b.i.4.a – b**, the Permittee shall:

- a. Store all hazardous substances, petroleum/oil liquids, and other chemical solid or liquid materials that have potential to contaminate stormwater on an impervious surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed tank volume or 110% of the volume contained in the largest tank, whichever is greater, or use double-walled tanks.
- b. Prevent precipitation from accumulating in containment areas with a roof or equivalent structure or include a plan on how it will manage and dispose of accumulated water if a containment area cover is not practical.

- **VIOLATION and CORRECTIVE ACTION:** Facility does not have BMP / maintenance records and needs to start acquiring and retaining them from their tenants. **Snoqualmie Mill shall implement immediately.**

Permit Condition: In accordance to **permit condition S9.D.1**, Permittee shall retain the following documents onsite for a minimum of five years:

- a. A copy of this permit.
- b. A copy of the permit coverage letter.
- c. Records of all sampling information specified in Condition S4.B.3.
- d. Inspection reports including documentation specified in Condition S7.
- e. Any other documentation of compliance with permit requirements.
- f. All equipment calibration records.
- g. All BMP maintenance records.
- h. All original recordings for continuous sampling instrumentation.
- i. Copies of all laboratory reports as described in Condition S3.B.4.
- j. Copies of all reports required by this permit.
- k. Records of all data used to complete the application for this permit.

- **VIOLATION and CORRECTIVE ACTION:** Facility does not log dates and attendees of annual training and needs to start documenting. **Snoqualmie Mill shall implement immediately.**

Permit Condition: In accordance to **permit condition S3.B.4.b.i.5.a.d**, the training plan shall include a log of the dates on which specific employees received training.

- **VIOLATION and CORRECTIVE ACTION:** Facility does not have storm-resistant lids on their dumpsters and needs to add lids on them. **Snoqualmie Mill has (30) calendar days to complete.**

Permit Condition: In accordance to **permit condition S3.B.4.b.i.2.d**, Permittee shall keep all dumpsters under cover or fit with a storm resistant lid that must remain closed when not in use (tarps are not considered storm resistant).

- **VIOLATION and CORRECTIVE ACTION:** Facility does not have / use drips pans during diesel fuel transfer operations and needs to start using drips pans. **Snoqualmie Mill has (30) calendar days to complete.**

Permit Condition: In accordance to **permit condition S3.B.4.b.i.4.f**, the Permittee shall use drips pans or equivalent containment measures during all petroleum transfer operations.

- **VIOLATION and CORRECTIVE ACTION:** Facility does not have non-metallic shovels in their spill kits and needs to include them in the kits. **Snoqualmie Mill has (30) calendar days to complete.**

Permit Condition: In accordance to **permit condition S3.B.4.b.i.4.c**, Permittee shall locate spill kits within 25 feet of all stationary fueling stations, fuel transfer stations, mobile fueling units, and used oil storage/transfer stations. At a minimum, spill kits shall include:

- i) Oil absorbents capable of absorbing 15 gallons of fuel. Facilities with a Spill Prevention, Control, and Countermeasures Plan (SPCCP) must have enough oil absorbents capable of absorbing the minimum anticipated spill amount or potential discharge volume identified in that plan if more than 15 gallons.
- ii) A storm drain plug of cover kits.
- iii) A non-water containment boom, a minimum of 10 feet in length with a 12-gallon absorbent capacity.
- iv) A non-metallic shovel.
- v) Two 5-gallon buckets with lids.

- **CORRECTIVE ACTION:** Facility needs to clean up oil sheens immediately once observed. **Snoqualmie Mill shall implement immediately.**

Permit Condition: In accordance to **permit condition S3.B.4.b.i.3.d**, the Permittee must clean up spills and leaks immediately (e.g., using absorbents, vacuuming, etc.) to prevent the discharge of pollutants.

- **CORRECTIVE ACTION:** Facility currently samples commingled stormwater and needs to sample stormwater associated with Facility's industrial activity. **Snoqualmie Mill has (30) calendar days to complete.**

Permit Condition: In accordance to **permit condition S4.B.2.a**, the Permittee shall designate sampling location(s) at the point(s) where it discharges stormwater associated with industrial activity off-site.

- **Recommendation:** Facility should cover metallic materials in wooden crates located in Flatiron's property.

For questions about this report, please contact Ecology Inspector Dennis Lee at dennis.lee@ecy.wa.gov, (425) 213-9065 or Department of Ecology, Water Quality Program at 15700 Dayton Ave. N., Shoreline WA 98133.

For assistance with any of these compliance issues or recommendations 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 National Pollutant Discharge Elimination System (NPDES) permit and/or state laws and regulations.

<i>DENNIS LEE</i>	April 11, 2022	<i>AMY JANKOWIAK</i>	April 14, 2022
Dennis Lee Industrial Stormwater Inspector Water Quality Program	Date	Amy Jankowiak Compliance & Technical Assistance Unit Supervisor Water Quality Program	Date

Photo Log
Snoqualmie Mill Industrial Areas
All photos taken by Dennis Lee on April 5, 2022



Photo 01
Description: Photo of containers / storage.



Photo 02
Description: Photo of wooden beams.



Photo 03
Description: Photo of steel beams



Photo 04
Description: Photo of large pipes.



Photo 05
Description: Photo of pipes, beams, and other materials.



Photo 06
Description: Photo of metallic materials.

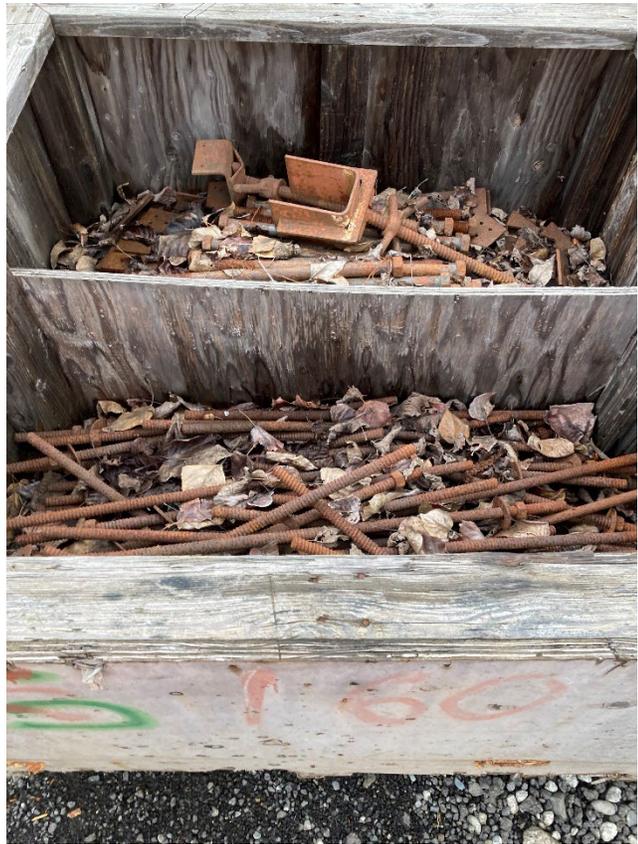


Photo 07
Description: Photo of metallic materials.



Photo 08
Description: Photo of metallic materials.



Photo 09
Description: Photo of dumpster without lid.



Photo 10
Description: Photo of contents inside dumpster (Photo 09).

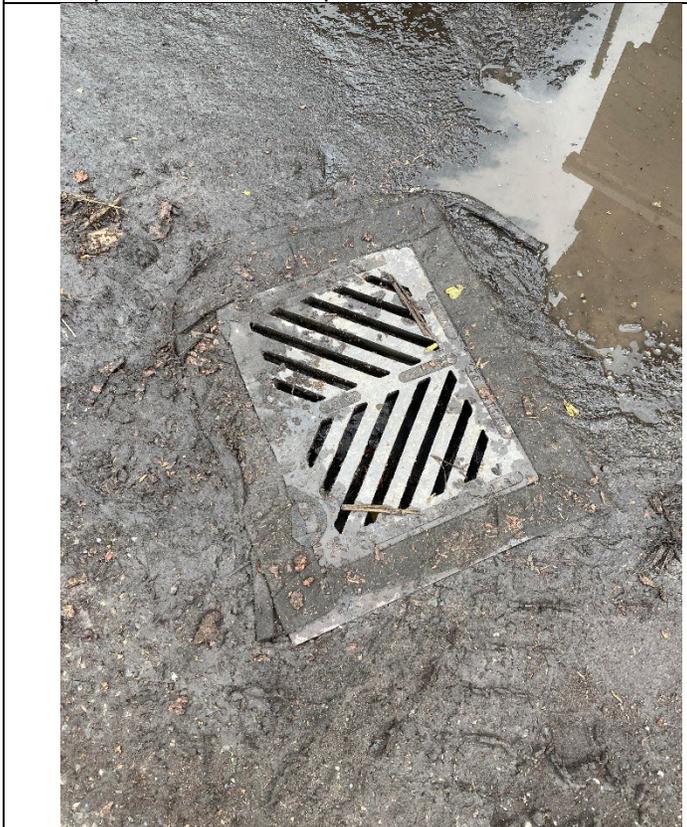


Photo 11
Description: Photo of catch basin at entrance.

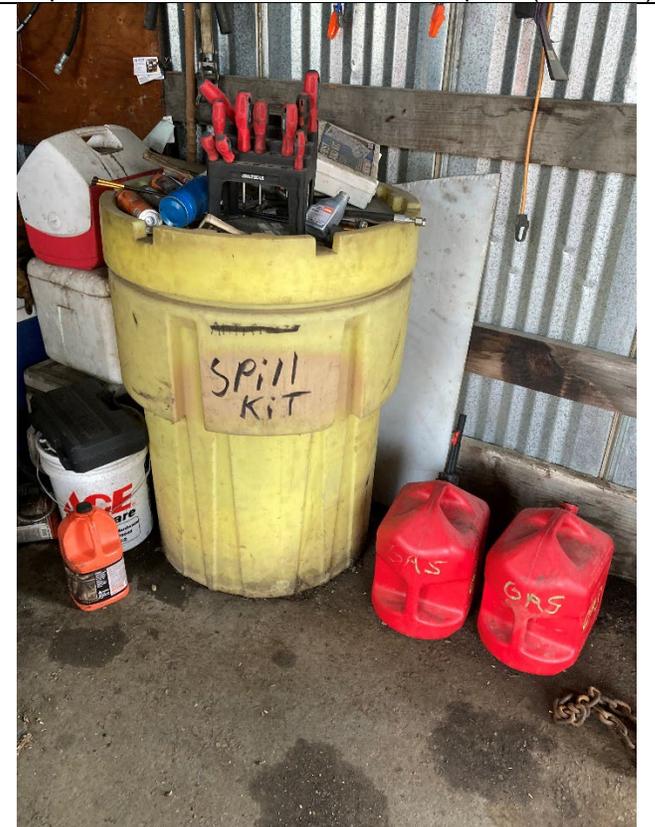


Photo 12
Description: Photo of gasoline without secondary containment.

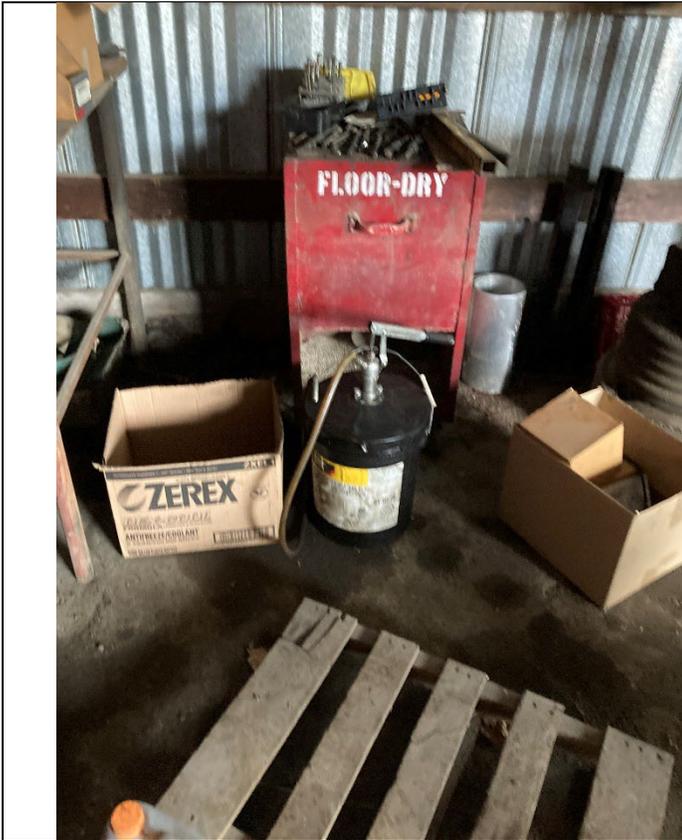


Photo 13
Description: Photo of chemical container without secondary containment.



Photo 14
Description: Photo of drums without secondary containment.

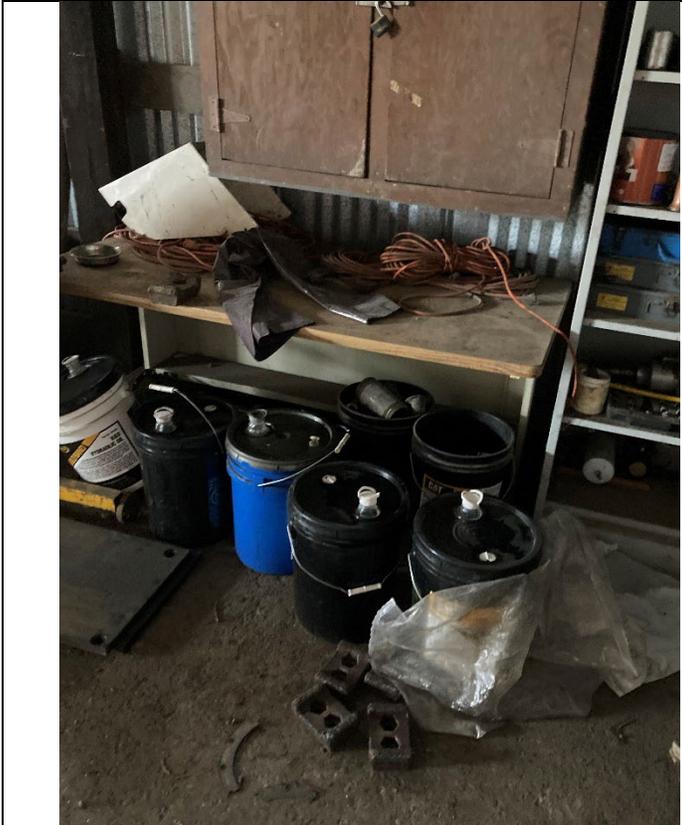


Photo 15
Description: Photo of buckets without secondary containment.



Photo 16
Description: Photo of fueling station with no drip pans.



Photo 17
Description: Photo of log storage.



Photo 18
Description: Photo of log storage.



Photo 19
Description: Photo of firewood and wood debris.



Photo 20
Description: Photo of black colored water.



Photo 21
Description: Photo of black water source.



Photo 22
Description: Photo of black liquid leaking out of dumpster.



Photo 23
Description: Photo of bark piled in dumpster.



Photo 24
Description: Photo of bark inside dumpster.



Photo 25
Description: Photo of oil sheen.

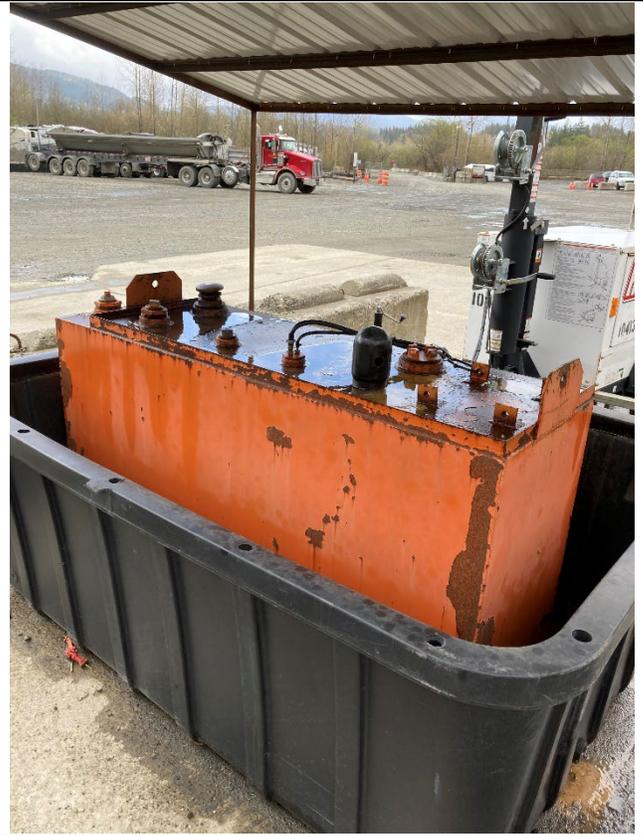


Photo 26
Description: Photo of diesel fuel tank.



Photo 27
Description: Photo of oil sheen.



Photo 28
Description: Photo of oil sheen.

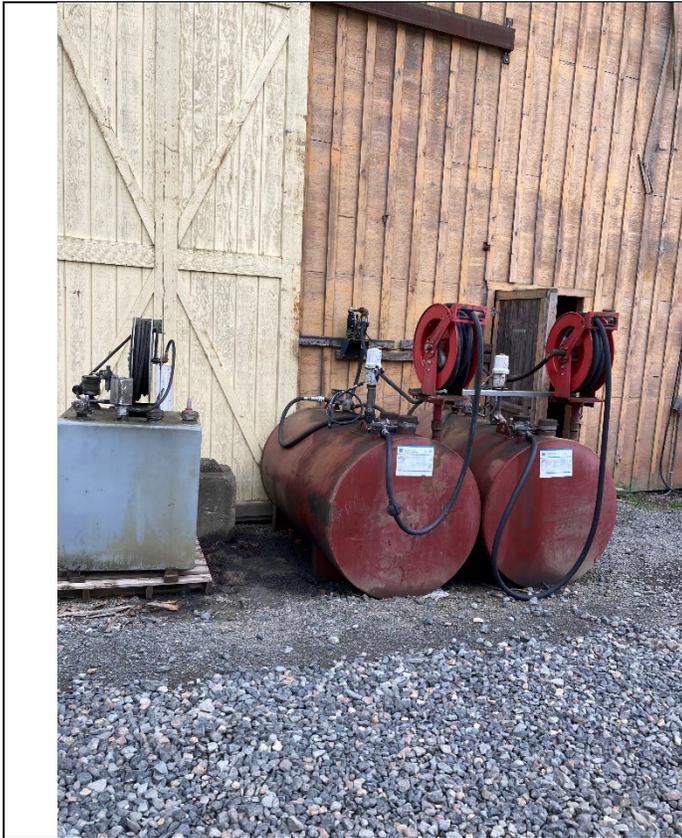


Photo 29
Description: Photo of fuel tanks at east side of part of Hos Bros property.



Photo 30
Description: Photo of spill kit next to fuel tank.

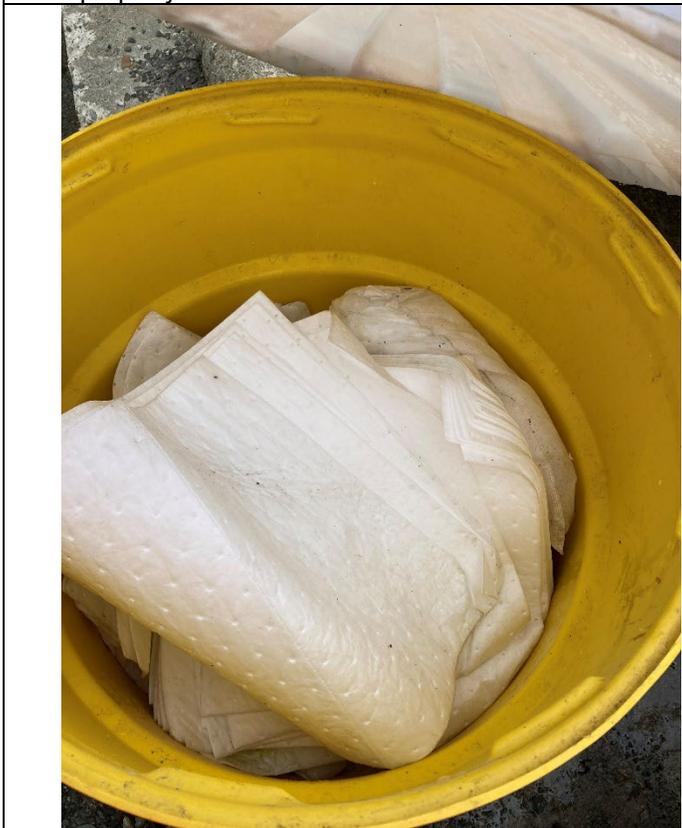


Photo 31
Description: Photo of contents inside fuel tank; non-metallic shovel missing.



Photo 32
Description: Photo of containers with diesel without secondary containment.

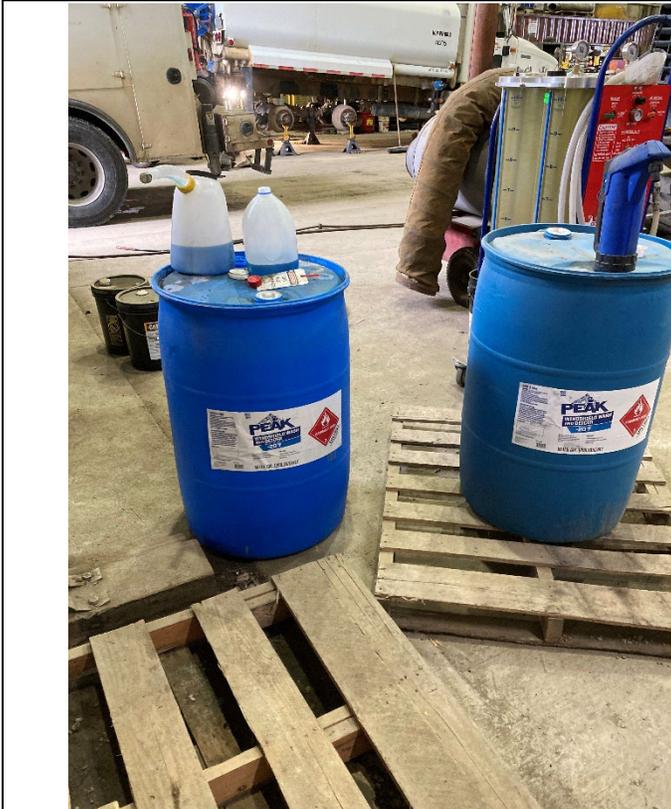


Photo 33
Description: Photo of drums without secondary containment.



Photo 34
Description: Photo of drum without secondary containment.

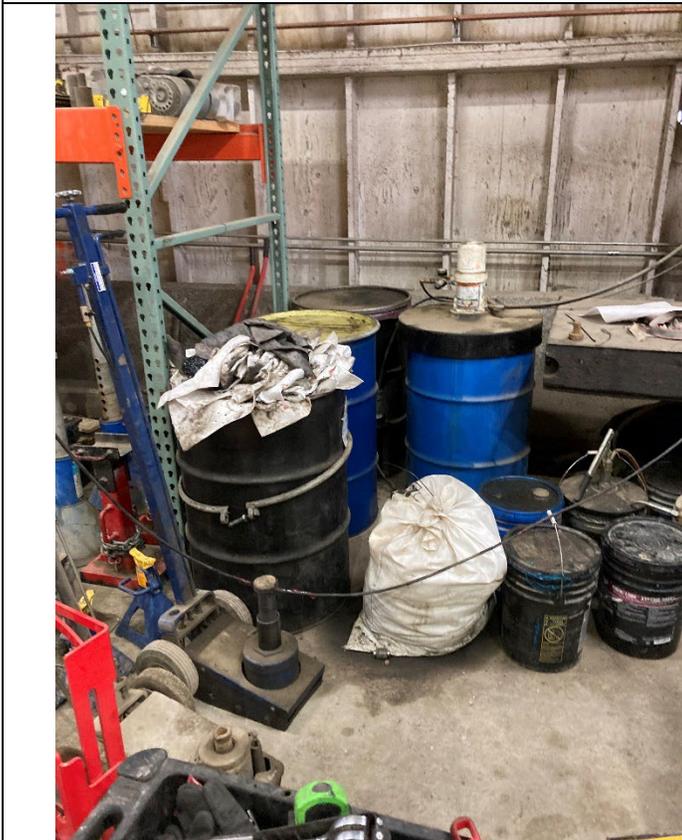


Photo 35
Description: Photo of drums and buckets without secondary containment.

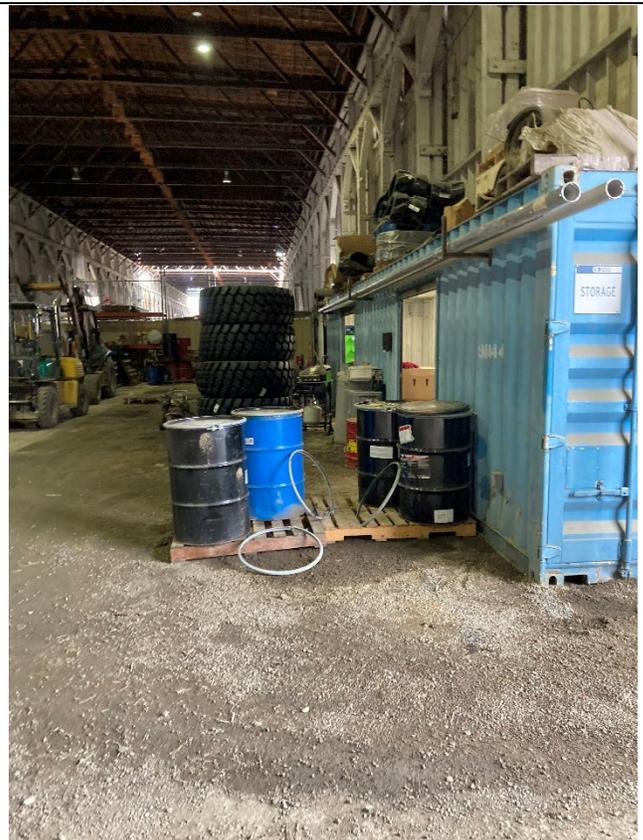


Photo 36
Description: Photo of drums without secondary containment.

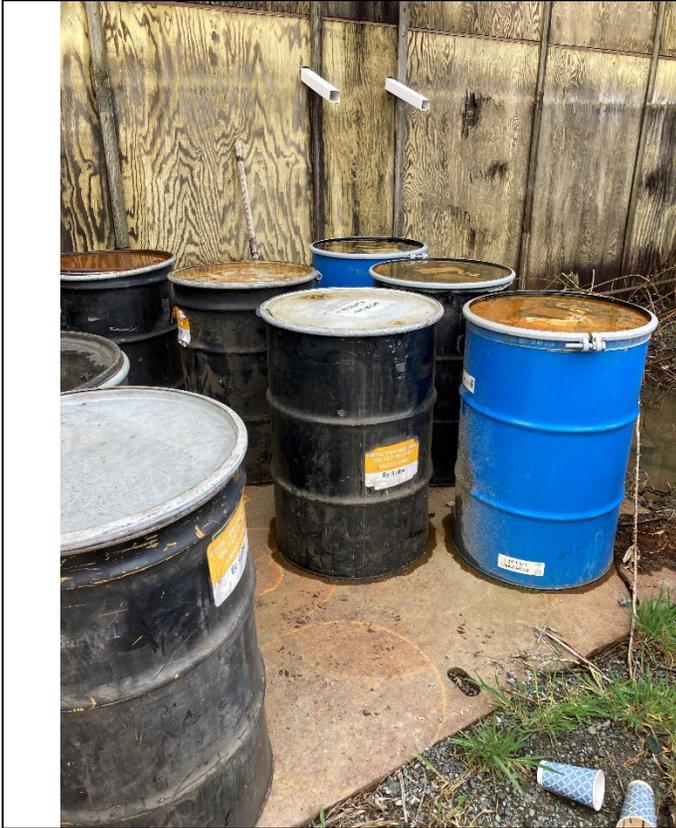


Photo 37
Description: Photo of drums outside without secondary containment.



Photo 38
Description: Photo of used oil totes without secondary containment.



Photo 39
Description: Photo of ditch next to drums.

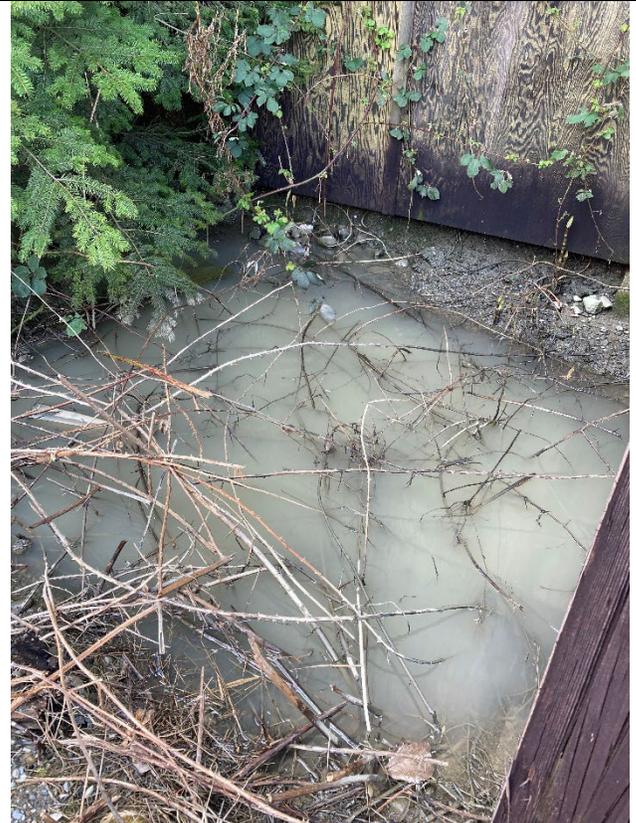


Photo 40
Description: Photo of ditch next to totes (Photo 38).



Photo 41
Description: Photo of black residue on ground; leaks observed coming out of hose.



Photo 42
Description: Photo of hose connected to container attachment.



Photo 43
Description: Facing west, photo of rock-lined ditch with silt fences and wattles.



Photo 44
Description: Photo of straw wattles and bales.



Photo 45
Description: Photo of turbid water.



Photo 46
Description: Facing south, photo of sample location 01.



Photo 47
Description: Photo of sample location 02 marked by pink colored stick.