

 <h2 style="text-align: center;">STORMWATER COMPLIANCE INSPECTION REPORT</h2> <p style="text-align: center;">State of Washington Department of Ecology 15700 Dayton Avenue N, Shoreline, WA 98133</p>					WADOE Stormwater Phone: (206) 594-0000										
Section A: General Data															
Inspection Date 4/27/2022	NPDES Permit # WAR305202	County King	Receiving Waters Mill Creek	Inspector Rose Propst	Facility Type Industrial										
Discharges to: Surface Water <input checked="" type="checkbox"/> Ground Water <input type="checkbox"/>				ANNOUNCED Inspection											
Section B: Facility Data															
Name and Location of Site Inspected				Entry Time	Permit Effective Date										
Mondelēz Global, LLC 19032 62 nd Ave S Kent, WA 98032				9:30 AM	1/1/2020										
				Exit Time	Permit Expiration Date										
				10:30 AM	12/31/2024										
On-Site Representative(s): Name(s)/Title(s)/Contact number(s) or E-mail				Additional Participants:											
Betsy Boyko Manager of Customer Logistics (253) 395-3167 betsy.boyko@mdlz.com				Kenzi Smith, ERM (consultant)											
Responsible Official(s):				Sampling and Photos											
Betsy Boyko (see above for contact information)				<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>Mondelēz Global, LLC ("Mondelēz") is covered under Ecology's Industrial Stormwater General Permit (ISGP #WAR305202). Ecology's stormwater unit has not conducted an inspection at this facility. The purpose of this inspection was to conduct a compliance inspection of the facility, meet onsite staff, and provide technical assistance as appropriate.</p> <p>The facility currently samples from surface drain 2 in the northwestern portion of the facility, west of the loading and unloading area. The facility previously had all five catch basins onsite on file as sampling points. Mondelēz submitted an ISGP Discharge/Sample Point Update Form to remove sample points 1, 3, 4, and 5, signed and dated 2/9/2021, which went into effect 3Q21. No data (failure to sample/submit data) for sample points 1, 3, 4, and 5 were shown as a Permit Violations in PARIS until 4Q21; however, Ecology acknowledges the lack of samples collected in the period between form submittal and 3Q2022 would not be considered Permit violations. The facility discharges to Lower Mill Creek which is a category 5 303(d) listed waterbody for zinc and bacteria; a benchmark of 70 micrograms per liter (µg/L) for zinc has been assigned to discharge from this facility.</p> <p>Below is a summary of sampling and compliance results for the facility during the current permit cycle (2020 to present):</p> <ul style="list-style-type: none"> • 2020: The facility claimed no discharge during the first three quarters of 2020. During 4Q20, sample points 1, 3, 4, and 5 were not sampled. No benchmarks were exceeded during 4Q for sample point 2, which was the only sample collected and reported during the year. • 2021: During 2021, sample points 1, 3, 5, and 5 were not sampled, and the only sample results reported were from sample point 2. <ul style="list-style-type: none"> ○ During 1Q, zinc exceeded the benchmark (70 µg/L) with a concentration of 78 µg/L, triggering a level 1 corrective action for zinc. ○ During 2Q, zinc exceeded the benchmark with a concentration of 91 µg/L, and turbidity exceeded the benchmark of 25 nephelometric units (NTU) with a result of 31 NTU, triggering a level 2 corrective action for zinc and level 1 corrective action for turbidity. ○ During 3Q, zinc exceeded the benchmark with a concentration of 140 µg/L and turbidity exceeded the benchmark with a result of 36 NTU, triggering a level 3 corrective action for zinc and a level 2 corrective action for turbidity. ○ No benchmarks were exceeded for 4Q. Note: zinc concentration was reported on the facility DMR at 0.014 ug/L; review of laboratory data indicates the laboratory reported the zinc result in milligrams per liter (mg/L). • 2022: The 1Q sampling form and laboratory results were provided by the facility. No benchmarks were exceeded. Note: copper and zinc were reported on the lab report in mg/L. 															

B. Boyko provided the following documents electronically upon request prior to the inspection:

- Stormwater pollution prevention plan (SWPPP)
- Last 6 monthly inspection reports
- Last 6 months of BMP maintenance records
- Copies of the last 2 laboratory reports (4Q21 and 1Q22).

These documents were reviewed offsite to minimize face-to-face contact during the COVID-19 pandemic.

INSPECTION/OBSERVATIONS

Inspection: Upon arrival, Ecology inspector Rose Propst met Betsy Boyko, Manager of Customer Logistics, and Kenzi Smith, site consultant. Mondelēz leases and occupies approximately 4 acres of an approximately 9-acre parcel that contains another distribution business, and utilizes dock doors 1 through 20 of the facility building. The facility is bordered to the north by Cosentino, a countertop surfaces/home hardware distributor, which occupies the remainder of the building. Two railroad spurs adjoin the property to the east, followed by another distribution warehouse. The facility is bordered by S 194th St to the south and 62nd Ave S to the west. Onsite operations include unloading and distribution of snack foods (finished product), as well as mobile fueling and vehicle washing. Effective hours of operation are 5 AM to 5 PM Monday through Friday, with operations on weekends as needed.

- The inspection covered the paved western (Photo #1) and southern (Photo #2) portions of the facility, and observation of the eastern portion of the facility (eastern building exterior and adjoining railroad spur [Photo #3]) from the southern easement.
- The stormwater sample is collected from an outlet pipe within storm drain #2 in the northwestern portion of the facility. This drain collects storm water from the areas of operation (Photo #4), fueling, and washing, and catch basin #1 in the northwestern corner of the facility, then discharges to the Kent municipal separate storm sewer system ("MS4") on 62nd Ave S. Catch basins in the southwestern and southern portions of the lot collect surface flow and roof drain outflow (See Photo #2). The southern portion of the site is used for employee parking and occasional trailer storage. These drains also drain to the Kent MS4.
- Some debris was observed in the staging/unloading/loading area near the building exterior (Photo #5). We discussed trailer movement and sweeping schedules, as well BMPs in place such as manual sweeping/leafblowing to remove debris around staged trailers or between sweeping visits. Curbing around a landscape island had degraded and landscaping material was sloughing into the parking lot (Photo #6). This island is located along the western exterior of the building within the permitted area. We discussed repairing the berm as soon as possible to prevent soils and/or fertilizer from washing into the driveway and to the sample point.
- Some floating debris was observed within catch basin vaults (Photo #7). Catch basins were not equipped with catch basin filter inserts. Mondelēz and ERM indicated that discussions were underway with the property owner/manager regarding purchasing and maintenance responsibility of the filters. Ecology urged the facility to expedite the installation of filters to reduce sediment and debris buildup in the catch basins and discussed the 2021 benchmark exceedances and corrective actions required. CBRE is reportedly responsible for catch basin cleanout, and Mondelēz contracts the parking lot sweeping. Sweeping consists of mechanical vacuum sweeping as well as leaf blowing/manual sweeping in areas that are not able to be mechanically swept. Trailers are also moved if needed. The provided BMP maintenance records indicate catchbasin cleaning was last performed 3Q21 and vacuum sweeping is performed quarterly.
- Mondelēz contracts mobile refueling and vehicle washing vendors, who perform these operations along the western exterior of the facility. Mobile refueling contractors reportedly place drain covers and drip pans during refueling, and spill kits are kept inside the facility to prevent theft. The vehicle washing vendor reportedly performs washing in "bathtub"-style containment and wash water is collected and disposed of offsite. Washing and refueling were not occurring and were not observed at the time of the inspection.
- The northern portion of the site may also receive storm water runoff from the northern-adjointing facility that shares the building with Mondelēz. During the inspection, the shared driveway contained a rack of stone or composite slabs (permitted facility boundary and staged materials shown in Photo #8). We discussed the possibility of Mondelēz talking with property manager/landlord regarding erecting a berm or other structure to prevent run-on that may come into contact with materials stored at the northern-adjointing facility. The drive appeared to have some topographic variation to help with diverting storm water, but as it was not raining at the time of inspection, the exact flow path could not be ascertained.

Onsite document review: Required documentation is kept electronically on site and select requested documents were provided to Ecology prior to the inspection. Ecology recommended the spill plan be printed and posted in the facility office and made available to drivers in the event of an emergency. The facility had a general spill response flier posted in the break room.

Closing Meeting: During the closing meeting, the following items were discussed:

- Recommend printing and posting spill plan and provide signage for spill kit locations
- If needed, set up meeting to discuss Level 2/3 corrective actions for 2021 exceedances
- Facility needs to implement level corrective action and move forward with discussions with landlord/property management regarding BMP installation.

Compliance/Recommendations

Compliance Requirements

The annual report for 2021 has not been received and was due 5/15/2022. Upload the annual report upon receipt of this inspection report.

SWPPP/Recordkeeping

- In accordance with the NOI for the 2020 ISGP, upload a current facility map **with features in accordance with S3.B.1** of the ISGP to PARIS via the Water Quality Portal.
- **In accordance with S3.B.1**, the following items must be added to the SWPPP facility map:
 - The scale or include relative distances between significant structures and drainage systems (**S3.B.1.a**)
 - Locations of stormwater inlets and outfalls with a unique identification number for each sampling point and discharge point, **indicating any that are identified as substantially identical**, and identify, by name, **any other party other than the Permittee that owns any stormwater drainage or discharge structures (S3.B.1.m)**.
 - Please identify which discharge points from the facility are considered substantially identical to sample point 2.
 - Please note Permittee vs. landlord/property owner/property manager-owned and -maintained conveyance structures.
 - Locations and sources of run-on to your site from adjacent properties that may contain pollutants (**S.3.B.1.p**)
 - Potential run-on from northern-adjointing paved area is included in map; however, consider precipitation to roof, where stormwater flows from roof to drains, and how roof flow is conveyed to discharge locations.
- SWPPP Section 4.2 – description of roof flow: please clarify where the gutter system discharges roof flow, if it is or is not commingled with roof flow from portion of building not occupied by Permittee, and if it is included in sample collection area.
- SWPPP Section 9.2 Sampling Summary: the zinc benchmark is noted as 71 µg/L. Please note the benchmark on file for this facility is **70 µg/L**.

In accordance with S3.A.3.a.ii, the Permittee shall modify the SWPPP to correct the deficiencies identified in writing from Ecology within 30 days of notice.

- Inspections – 3/21/22 inspection report indicates that an oil sheen was observed the discharge coming from employee parking area and filter installation is in process. A sheen may be indicative of a leak or spill that needs to be addressed immediately per **S3.B.4.b.i.3.d**. Sheen observation/spill response procedures must be documented in the facility spill log. At the time of Ecology's inspection, no filters had been installed. Please note standard catch basin filter inserts are not appropriate BMPs for spill response.

Sample Collection/Analysis

- **In accordance with S5.A.2 Table 2**, the acceptable quantitation level (QL) for zinc is 2.5 µg/L. The lab QL for zinc is noted at 2.5 µg/L in the SWPPP. Laboratory data provided indicates the reporting limit (RL) for zinc is 7 µg/L and no additional method detection level (MDL)/QL information is given. **The Permittee must analyze samples at or below the acceptable QL provided in the ISGP and SWPPP.**
- **In accordance with S5.A.2 Table 2**, the acceptable QL for turbidity is 0.5 NTU. The lab QL for turbidity is noted at 0.5 NTU in the SWPPP; however, the QL for turbidity in laboratory data is listed at 1 NTU and no additional MDL/QL information is given. **The Permittee must measure/analyze samples at or below the acceptable QL provided in the ISGP and SWPPP.**

Beginning in 3Q2022, samples must be analyzed and reported with acceptable QLs in accordance with S5.A.2 Table 2 of the ISGP.

Other compliance items

- **In accordance with S3.B.4.b.ii.2.a**, Permittees shall use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away from these areas.

- Use the above-mentioned mandatory structural source control BMPs to address off-site run-on as applicable.
- The facility triggered a Level 2 corrective action for turbidity and a Level 3 corrective action for zinc in 2021. Please note the deadline for Level 2 corrective action is August 21, 2022.

Recommendations

- Repair curbing around landscaping island on western side of building exterior immediately to ensure soil or fertilizer do not mix with precipitation and enter storm drain.

For questions about this report, please contact Ecology Inspector Rose Propst at rpro461@ecy.wa.gov, (425) 213-9155, or Dept. of Ecology, Water Quality Program, 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 NPDES permit and/or state laws and regulations.

Reviewed and approved by:	
<i>Rosemary Propst</i>	June 7, 2022
Rose Propst Industrial Stormwater Inspector Water Quality Program	Date
<i>Amy Janłowiak</i>	
June 6, 2022	
Amy Jankowiak Compliance and Technical Assistance Unit Supervisor Water Quality Program	
Date	

PHOTO ADDENDUM – MONDELÉZ GLOBAL, LLC
ALL PHOTOS TAKEN BY ROSE PROPST ON 4/27/2022



PHOTO 1
DIRECTION: North
DESCRIPTION: Western drive/parking area of facility.

PHOTO 2
DIRECTION: East
DESCRIPTION: Southern side of facility; note roof drains on building exterior draining to pavement.



PHOTO 3
DIRECTION: North
DESCRIPTION: Eastern side of facility (vegetated and railroad spur).

PHOTO 4
DIRECTION: East
DESCRIPTION: Loading docks and dumpster along western building exterior.



PHOTO 5
DIRECTION: West
DESCRIPTION: Debris on pavement in truck bays along western building exterior.



PHOTO 6
DIRECTION: East
DESCRIPTION: Landscaping island with deteriorated curb.



PHOTO 7
DIRECTION: N/A
DESCRIPTION: Representative photo of interior of catch basin vault.



PHOTO 8
DIRECTION: East
DESCRIPTION: Northern boundary of facility and north-adjointing business within same drive and building; permitted facility utilizes bays 1-20. Note staged materials in left side of photo.