



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Southwest Region Office
PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

June 24, 2022

June Moran, Permittee
TEMCO
550 Dock Street
Tacoma, WA 98402

Re: NPDES Permit Number WAR007651

Dear Joan Moran:

Enclosed is the report from the Department of Ecology's recent virtual National Pollutant Discharge Elimination System (NPDES) Industrial Stormwater General Permit (ISGP) compliance inspection conducted at your facility. Thank you for the time Drew Harris of Momentum Civil spent with us during my virtual visit.

Please contact me at honor.carpenter@ecy.wa.gov or (360) 485-2701 if you have any questions, comments, or would like additional technical assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Honor Carpenter".

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

Enclosures: Industrial Stormwater Inspection Report
Table 1- DMR Review 2020- 2022
Image Log

cc: Melinda Wilson, 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	R	007	651	2022	5	17	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		

Section B: Facility Data

Name and Location of Facility Inspected June Moran, Permittee TEMCO 550 Dock Street Tacoma, WA 98402	Entry Time/Date 11:15 hours 5/17/2022	Permit Effective Date January 1, 2020
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number June Moran, Superintendent Phone: (253) 572-3511 Email: june.moran2@chsinc.com	Other Facility Data (e.g., SIC NAICS, and other description information) Facility occupies 9.2 acres	
Name, Address of Responsible Official/Title/Phone and Fax Number June Moran, Permittee TEMCO 550 Dock Street Tacoma, WA 98402 Phone: (253) 572-3511 Email: june.moran2@chsinc.com	North American Industrial Classification System (NAICS): 424510, Grain and Field Bean Merchant Wholesalers	
	Contacted? <input checked="" type="checkbox"/> Yes <input 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)

WAR007651 is a National Pollutant Discharge Elimination System (NPDES) Industrial Stormwater General Permit (ISGP) that authorizes Tacoma Export Marketing Company (TEMCO) to discharge stormwater associated with industrial activity and conditionally approved non-stormwater to a surface waterbody of the State of Washington (State) or to a storm sewer system that drains to a surface waterbody of the State.

The excerpt below from the facility's SWPPP provides a clear description of industrial activities at TEMCO.

“This facility transfers grain from railroad grain cars into grain elevators and then to oceangoing cargo ships. The railroad cars enter the TEMCO property from the north on Burlington Northern Santa Fe Railroad lines (see Section 1.4 for site map). These railroad grain cars are positioned within a covered building where their bottom doors open and the grain spills into a receiving pit. Elevators then lift the grain into the temporary storage silos and then to the ocean-going ships. After the railroad grain cars are emptied, they are moved to the south. This process does not vary significantly during seasons or climates.”

This report conveys findings from a virtual site inspection (VSI) conducted over Microsoft Teams meeting software with June Moran, TEMCO Superintendent, and TEMCO's consultant, Drew Harris, of Momentum Civil. June Moran

electronically provided the documents that I requested several days prior to the inspection. I asked for a subset of the documents that S9 requires permittees to retain onsite. The file review findings are summarized below, starting at S3. I started the inspection with a brief opening conference during which we introduced ourselves and reviewed the virtual inspection process. June Moran used TEMCO's extensive security camera network to show me the facility's five basins and monitoring points. Drew Harris provided additional technical information regarding the treatment systems in place and helped describe the chronology of upgrades at TEMCO. After we looked at the facility, I thanked Drew Harris and June Moran for their time.

S3. – Stormwater Pollution Prevention Plan (SWPPP) –

- Two versions of the SWPPP were provided, *TEMCO ISWP_SWPPP may 2022* and its predecessor, *2018-12-20_ISGP SWPPP*.
- A SWPPP Update/ Revision Log was provided, which correlated SWPPP updates with corrective actions completed.
- Cover pages stated SWPPPs were developed on February 10, 2010, updated several times, most recently on May 5, 2022.
- SWPPPs were signed and certified in accordance with ISGP S3.A.5 and G2.
- SWPPP Certification forms included with the SWPPP:
 - February 10, 2021 for completion of Level 2 corrective actions.
 - July 3, 2021 for completion of Level 3 corrective actions.
 - November 1, 2021 for completion of Level 3 corrective actions.
 - February 5, 2021 for completion of Level 1 corrective action.
- SWPPP included a SWPPP Maintenance Log that documented the BMP maintenance activities listed below:

DATE	WORK	Contractor
12/09/2021	Clean and fix storm water filter at seawall	Pro-Vac
12/09/2021	MSI street sweeping	MSI
01/05/2022	Replaced waddles around seawall drains.	ILWU
01/28/2022	Vault inspection and service	Raingarden NW
04/05/2022	MSI street sweeping	MSI
04/25/2022	Storm water pre-settle tank pump out and cleaning	Pro-Vac

- SWPPP included a Level 3 Engineering and Design Report, installation guidelines, Operations and Maintenance documents and maintenance agreement information for the BioClean Modular Wetland System- Linear Hybrid Filtration system.

S3.B- Specific SWPPP requirements –

The SWPPP included the Best Management Practices (BMPs) identified as mandatory for the facility. Because TEMCO transfers grain from railroad grain cars into grain elevators and then to ocean-going cargo ships, the SWPPP contained a wide range of BMPs that include railroad-focused BMPs (for example, Rail Transfer Areas to Above/Below-ground Storage Tanks and Operational Source Control BMPs for Maintenance of Public and Private Utility Corridors and Facilities) as well as marine-focused BMPs (for example, Loading/ Unloading from/to Marine Vessels).

S4. – General Sampling Requirements –

TEMCO has five monitoring points that correspond to five drainage areas and outfalls

Outfall	Drainage Area	Sample point location	Receiving Environment	Receiving Environment Impairment	Treatment BMPs
A	TEMCO access road	City of Tacoma MS4	Thea Foss Waterway Puget Sound Sediment Cleanup Site	4B Sediment	StormFilter catch basin inserts with ZPG cartridges
B	Parking area east of E. Dock St.		Commencement Bay	no	

C	Grain silos	South silos	Commencement Bay Via scuppers	no	StormFilter catch basin inserts with Dual Metal RX cartridges; Coated galvanized surfaces
D1	Facility (office) Roof	Modular Wetlands	Commencement Bay	no	Upgrading treatment train by Removal of pre-settling tank
E	North Service Area	StormFilter Outfall	Commencement Bay	no	StormFilter catch basins inserts with Metal RX cartridges

Momentum Civil personnel collected compliance samples from five monitoring points, identified as A, B, C, D1, and E. Momentum Civil staff conducted field analysis for turbidity, pH. Substantially identical outfalls were identified in the SWPPP.

S5. –Benchmarks, Effluent Limitations, and Specific Sampling Requirements –

The permittee monitored the Table 2 parameters applicable to all facilities- total copper (Cu); total zinc (Zn); turbidity; pH and oil sheen.

S6. – Discharges to Impaired Waters –

The facility discharges enter a segment of Commencement Bay that is identified as a Puget Sound Sediment Cleanup Site. Because the receiving environment is Category 4B (rather than Category 5) where the outfalls discharge, the facility must comply with the sampling requirements and benchmark value for total suspended solids (TSS) in Table 7 (S6.C.2.b).

S7. – Inspections –

- Monthly inspections were conducted, documented in writing, and included with the SWPPP. Although the SWPPP contained blank copies of the Ecology *Monthly Inspection template*, a different form, the *SWPPP Plant Inspection Report* was used instead of the Ecology template.
- The SWPPP Plant Inspection Report contained the assessments required by S7.C.1. Reports were comprehensive, including fields to assess the Rail Pit, Locomotives, and Storage areas.
- *SWPPP Plant Inspection Reports* were missing the certification and signature (S7.C.1.f) of the person described in Condition G2.A or a duly authorized representative of the facility in accordance with condition G2.B and D.
 - TEMCO's completed SWPPP Plant Inspection Reports do not include the G2.D certification. (See images # 5 and # 6 in attached Image Log for more information).
 - G2.D states that anyone signing a document under this section shall make the following certification:
"I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."
 - Updating TEMCO's SWPPP Plant Inspection Report to include the Permittee certification statement (G2.D) and associated signature field will make the form meet S7.C.1.f.
- In additional to Monthly inspection reports, inspection reports were provided for:
 - Bio Clean Modular Wetland System (MWS) Inspection Reports- checklist inspection for MWS treatment system.
 - Industrial Stormwater Sampling Spreadsheet- contains field to document field analysis of pH, turbidity, and oil & grease and observations made during quarterly monitoring.

S8. – Corrective Actions –

Corrective actions recently completed:

- Level 1 corrective action was completed on February 5, 2021.
- Level 2 corrective actions were completed on February 10, 2021.
- Level 3 corrective actions were completed on July 3, 2021.
- Level 3 corrective actions were completed on November 1, 2021.

S9. – Reporting and Recordkeeping –

I reviewed Discharge Monitoring Report (S9.B) and Annual Report (S9.C) data through the Water Quality WebPortal. Data were reviewed for a period, of nine quarters, from January 1, 2020 through March 31, 2022.

- S9.B- DMRs- See *Table 1, DMR Review 2020- 2022*.
- S9.C- Annual Reports for 2019 and 2020 were reviewed and deemed complete.

Reminder:

- S6.C.2.d requires permittee to remove accumulated solids from the conveyance system once per permit cycle.
- S6.C.2e Permittees shall sample and analyze storm drain solids in accordance with Table 8, at least once in the term of the permit.

Requirements-

- Revise Monthly Inspection reports to include the certification statement required by S7.C.1.f.
- Follow the terms and conditions of the ISGP.

- ☐ Announced
☒ Unannounced

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

Honor Carpenter

Honor Carpenter

Agency/Office/Phone and Fax Numbers

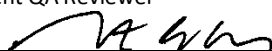
Ecology/SWRO (360) 485-2701

Date

06/07/2022

Signature of Management QA Reviewer

Steven G. Eberl, P. E.



Agency/Office/Phone and Fax numbers

Ecology/SWRO (564) 999-3584

Date

06/24/2022

EPA FORM 3560-3 (Rev 1-06) Previous editions are obsolete

Table 1- WAR007651 DMR Review 2020 - 2022

Violation Date	Parameter	Units	Benchmark Value	Reported Value	Outfall	Notes include CA information from SWPPP and Annual Reports for 2020 and 2021
01/01/2022	Zinc (Total)	Micrograms/L (ug/L)	117	153	D1	
10/01/2021	Zinc (Total)	Micrograms/L (ug/L)	117	287	D1	L3 CA completed 11/01/21
09/30/2021	pH (Hydrogen Ion)	Standard Units	5- 9	4.5	E	L1 CA completed (pH) 9/30/21
07/01/2021	Zinc (Total)	Micrograms/L (ug/L)	117	220	C	Fall flush L1 completed (Zn) in Q3
07/01/2021	Zinc (Total)	Micrograms/L (ug/L)	117	343	D1	L3 CA completed 7/03/21 L3 ongoing (StormRx)
04/01/2021	Zinc (Total)	Micrograms/L (ug/L)	117	398	D1	
01/01/2021	Zinc (Total)	Micrograms/L (ug/L)	117	184	D1	L2 CA completed (Zn) 2/10/21 L1 CA completed 2/05/21
10/01/2020	Zinc (Total)	Micrograms/L (ug/L)	117	195	D1	L3 CA Ongoing (Covid delays)
10/01/2020	Zinc (Total)	Micrograms/L (ug/L)	117	118.05	E	
07/01/2020	Zinc (Total)	Micrograms/L (ug/L)	117	256	C	L3 CA completed 9/2020
07/01/2020	Zinc (Total)	Micrograms/L (ug/L)	117	412	E	L1 CA completed 12/2020
04/01/2020	Zinc (Total)	Micrograms/L (ug/L)	117	123	C	
04/01/2020	Solids (Residue) (Total suspended (TSS))	Milligrams/L (mg/L)	30	37.2	A	AR discussed turbidity benchmark exceedance that does not show up in PARIS. TSS exceedance is not discussed in 2020 AR.
04/01/2020	Zinc (Total)	Micrograms/L (ug/L)	117	175	D1	
01/01/2020	Zinc (Total)	Micrograms/L (ug/L)	117	153	E	L1 CA completed Q4 2020
01/01/2020	Zinc (Total)	Micrograms/L (ug/L)	117	162	D1	L1 CA completed 1/2020

Legend:

L- Level

CA- Corrective action

Q- Calendar quarter

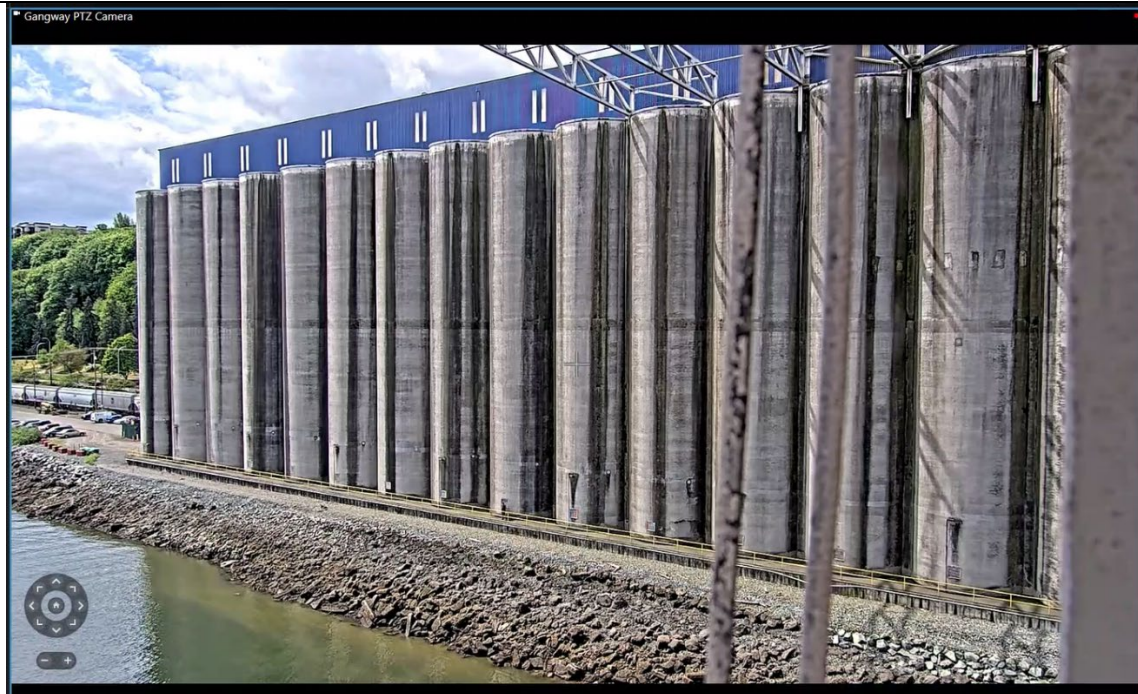
Permit #WAR007651

TEMCO

May 17, 2022

Image Log

1. Discharge "C" security camera view



2. Discharge Area "D" view from north, looking south



Image Log

- 3. Top down view of filtration units and pre-settling tank for Discharge "D"**
-Also included in this view are the pavement surfaces and StormFilter catch basin for Discharge "E"



- 4. Discharge Area "A" view looking south from the north end of Discharge "A"**

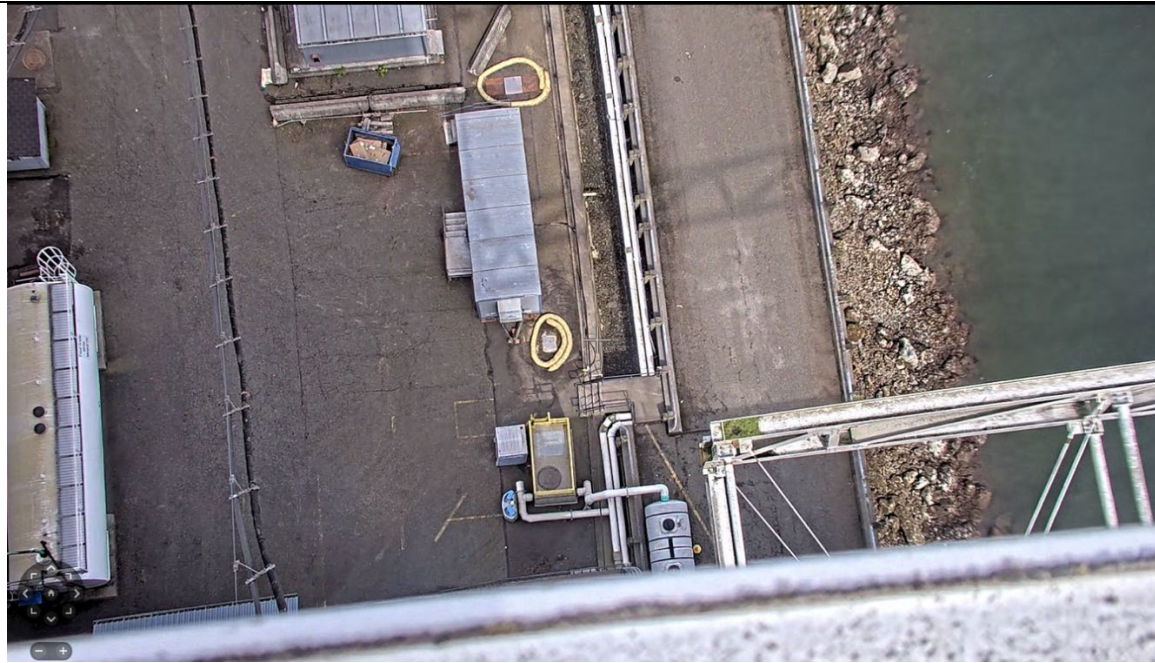


Image Log

5. Inspector and Permittee Certification statements on Ecology Monthly Inspection template

III. CERTIFICATION STATEMENTS AND SIGNATURES:

Inspector - Certification: This section must be completed by the person who conducted the site inspection prior to submitting this form to the person with signature authority (see Permit Condition G2) or a duly authorized representative of that person.

- ☐ The facility is in compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit.
- ☐ The facility is out of compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit. This report includes the remedial actions that must be taken to meet the requirements of the SWPPP and permit, including a schedule of implementation of the remedial actions.

"I certify that this report is true, accurate, and complete, to the best of my knowledge and belief."

Inspector's Name – Printed	Inspector's Signature	Inspector's Title	Date
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Permittee – Certification:

- ☐ The facility is in compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit.
- ☐ The facility is out of compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit. This report includes the remedial actions that must be taken to meet the requirements of the SWPPP and permit, including a schedule of implementation of the remedial actions.

"I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

PRINTED NAME of person with Signature Authority (permit condition G2.A) or a Duly Authorized Representative ¹	SIGNATURE of person with Signature Authority (permit condition G2.A) or a Duly Authorized Representative ¹	DATE
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¹A person is duly authorized representative only if 1) the authorization is made in writing by a person described in Permit Condition G2.A and submitted to Ecology, and 2) the authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility, such as the position of plant manager, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters.

6. TEMCO Monthly Inspection Report's Certification Statement

I certify that this report is true, accurate, and complete to the best of my knowledge and belief.

June Moran, Shift Lead

INSPECTED BY:

DATE:

June Moran
5/4/22