



**STATE OF WASHINGTON**  
**DEPARTMENT OF ECOLOGY**

**Southwest Region Office**

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

October 26, 2022

Dave Buffelen  
Environmental Excellence Leader  
Milgard Manufacturing, LLC  
1001 54th Avenue East  
Tacoma, WA 98424

Re: NPDES Permit Number WAR000074

Dear Dave Buffelen:

Enclosed is the report from the Department of Ecology's recent National Pollutant Discharge Elimination System (NPDES) Industrial Stormwater General Permit (ISGP) compliance inspection conducted virtually at Milgard Essence and Woodclad/ WAR000074 on October 11, 2022. Thank you for the time Lucas Samuel spent with me during my visit.

Please contact me at [honor.carpenter@ecy.wa.gov](mailto:honor.carpenter@ecy.wa.gov) or (360) 407-6273 if you have questions, comments, needs, or concerns.

Sincerely,

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

Enclosures: Industrial Stormwater Inspection Report  
Image Log

cc: Melinda Wilson, Ecology  
Lucas Samuel, Milgard



impaired receiving environment. Lucas Samuel walked around the 910 building first, then walked around the 1010 building. Lucas Samuel pointed out trash and recycle containers with lids closed that were located between buildings and along the west side of the facility. At the northwest corner of 1010, we looked at a clean concrete pad with a canopy that was fabricated to provide cover for recycle containers, regardless of whether containers arrived with lids. The west side of the facility included several protected storage areas which had canopy roofing over concrete pads. Lucas Samuel explained that shipping and receiving occurred under cover, on the north side of 1010 and south side of 910. Lucas Samuel pointed out the loading zones, large bay doors for both facilities with door skirts in place to further limit stormwater exposure. We looked at the Cyclone baghouse at the southwest corner of the site. The baghouse was enclosed by chain link fence with privacy slats and the surrounding pavement was very clean. We looked at dedicated storage sheds for tools associated with baghouse operations and maintenance. While walking, Lucas Samuel told me that Milgard recently contracted with Jet City vacuum sweeping to increase yard cleaning from monthly to twice a month and to power wash and clean the dust collection (baghouse) area annually and disposing of process water offsite. Lucas Samuel stated that Milgard continues to implement a successful practice (best management practice or BMP), morning walks with staff from the surrounding Milgard facilities during which trash, if any, is picked up and staff share observations regarding health, safety, and environmental improvement opportunities. When Lucas Samuel completed the walk around 1010, I thanked Lucas Samuel for his time and attention.

#### S3. – Stormwater Pollution Prevention Plan (SWPPP) –

The SWPPP cover page stated it was prepared by EnCo Environmental Company on January 14, 2020. The SWPPP was signed and certified in accordance with S3.A.5. SWPPP included an amendment log that explained the evolution of the SWPPP.

S3.B- SWPPP included the best management practices (BMPs) mandatory for manufacturing facilities.

#### S4. – General Sampling Requirements –

- EnCo Environmental Company technical staff collected compliance samples from one monitoring location, identified as FG2.
- Essence monitored the Table 2 parameters that S5 requires all permittees to monitor (total copper, total zinc, pH, oil & grease, and turbidity).

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

Additional sampling based on Milgard's Specific Industrial Group (SIG) was not required for this facility.

#### S6. – Discharge to Impaired Waterbodies –

- Additional sampling for freshwater ammonia was required at outfall FG2, on the west side of the facility, because discharge from FG2 enters a segment of the Fife ditch that was impaired for freshwater ammonia (Ammonia- N) when the permit was issued.
- Discharge points on the north side of the site were described and identified as substantially identical. North discharge points are in mostly administrative parking areas in the front of the building and enter Fife's municipal stormwater system which flows to a receiving environment that was *not* impaired when the permit was issued. Additional monitoring was not required at the north outfalls.

#### S7. – Monthly Inspections –

- Completed monthly inspection reports were reviewed for March through August 2022.
- EnCo Environmental Company technical staff completed monthly inspections and documented the findings in writing.
- Reports were signed and certified in accordance with S7 and were extremely organized and detailed. The reports provided assessments of most BMPs individually and provided actionable information.
- The first page of the monthly inspection reports contained sections for Required Corrective Actions and Areas of Concern, with any items listed in red font. Each listed item included a field for current status and projected estimated completion details.

#### S8. – Corrective Actions –

Level 1 Corrective Action was completed in response to an exceedance of the total zinc benchmark in 2021. Corrective Action response included installation of catch basin inserts targeting zinc at two catch basins (CB4 and CB5). The corrective action was summarized in the 2021 Annual Report.

S9. – Reporting and Recordkeeping –

- Documents selected for VFR were a subset of the documents ISGP S9 requires permittees to keep onsite.
- Discharge Monitoring Report (S9.B) data and Annual Report (S9.C) data were reviewed through the Water Quality WebPortal for a two-year period, from January 1, 2020, through December 31, 2022:
  - S9.B- The total zinc benchmark was exceeded in quarter 2, 2021.
  - S9.C- Annual Reports for 2020 and 2021 were submitted electronically, reviewed, and deemed complete.

**Requirements:**

Follow the terms and conditions of the ISGP.

- Unannounced  
 Announced

Name and Signature of Inspector <i>Honor Carpenter</i> Honor Carpenter	Agency/ Office Number Ecology/SWRO (360) 485-2701	Date 10/18/2022
Signature of Management QA Reviewer Steven G. Eberl, P. E. 	Agency/ Office Number Ecology/SWRO (564) 999-3584	Date 10/26/2022

1. Signage for east facility entrance at 54th Avenue East



2. Administrative parking on east side of facility, facing south.



3. Cyclone dust collection system at west end of south side of 1010 building



4. Generator under cover on south side of 1010 building



5. Impaired receiving waterbody on west side



6. Lidded recycle container under roof, west side



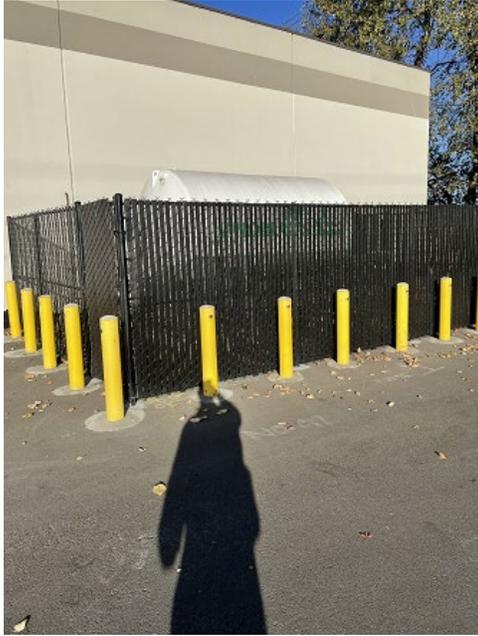
7 Covered glass recycle zone on south side of 910.



8. Glass recycle area, south side of 910



9. Liquid argon tank in area protected by bollards



10. Waste and recycle containers



11. Recycle container and wrapped finished materials on west side of 910



12. Covered storage

