		<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 3/2/2023	NPDES Permit # WAR301508	County King	Receiving Waters Duwamish via SPU Stormwater	Inspectors Jessica Kasmari David Adler	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 Plymouth Poultry 4500 7 th Avenue S. Seattle, WA 98108				Entry Time 9:15 am	Permit Effective Date 01/01/2020						
				Exit Time 11:45 am	Permit Expiration Date 12/31/2024						
On-Site Representative(s): Name(s)/Title(s)/Contact number(s) or E-mail Wes Himes Compliance and Purchasing Manager				Additional Participants:							
Mailing Address of Responsible Official(s): Wes Himes 4500 7 th Avenue S. Seattle, WA 98108 Phone: 206-310-2749				Weather: Overcast 40 degrees							
				Sampling and Photos							
				<table border="0"> <tr> <td></td> <td>Yes</td> <td>No</td> </tr> <tr> <td>Samples Taken?</td> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>Photos Taken?</td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>				Yes	No	Samples Taken?	<input type="checkbox"/>
	Yes	No									
Samples Taken?	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
Photos Taken?	<input checked="" type="checkbox"/>	<input type="checkbox"/>									
Section C: Summary of Findings/Comments											
<p>BACKGROUND Plymouth Poultry is conditionally authorized to discharge stormwater under Ecology's Industrial Stormwater General Permit (ISGP #WAR301508). The purpose of this inspection was to conduct an ISGP compliance inspection of the facility, meet onsite staff, and provide technical assistance as appropriate. Ecology's stormwater unit last conducted an inspection at this facility on June 6, 2019. The facility consists of 4 different buildings, all buildings are connected inside the plant.</p> <p>The facility moved their entire production to the Auburn location. They are in the process of moving the truck maintenance shop, expected to be completed May 2023. The building will be used as an overflow facility for food storage during the busier times. Part of the facility is currently being leased to Nicky USA, a food processing company. The fueling island and underground storage tank were removed. They no longer fuel trucks at this location. Truck traffic has been reduced from approximately 100 trucks/day to 5 trucks/day.</p> <p>There are 2 sampling points located on the 7th Ave side on the property SD-1 (stormdrain-1) and DS-1 (Downspout-1). A summary of compliance results from the current permit cycle (2020 to present) is below:</p> <ul style="list-style-type: none"> 1st Q 2020 Nitrate with a concentration of 3.85 and 0.863 mg/L exceeded the benchmark of 0.68 mg/L. Zinc concentration of 297 ug/L exceeded the benchmark of 117 ug/L. According to the annual report Plymouth Poultry opted to skip Level 1 corrective action and instead complete a Level 3 Corrective Action. 2nd Q 2020 Copper with a concentration of 29.9 and 37 ug/L exceeded the benchmark of 14 ug/L. Zinc with concentrations of 553 and 520 ug/L exceeded the benchmark of 116. Turbidity concentration of 42 NTU exceeded the benchmark of 25 NTU. According to the annual report Plymouth Poultry opted to skip Level 1 corrective action and instead complete a Level 3 Corrective Action. 2nd Q 2021 Level 1 Corrective Action Copper, Zinc and Nitrate benchmark exceedances. Nitrate concentration of 1.14 mg/L with a benchmark of 0.68 mg/L. Copper concentration of 42.1 ug/L with a benchmark of 14 ug/L and Zinc concentrations of 568.5 ug/L and 373.5 ug/L with a benchmark of 117 ug/L. The pillow media was replaced in the catch basins. 2nd Q 2022 Level 1 Corrective Action Copper with a concentration of 16.5 ug/L exceeded the benchmark of 14 ug/L. Cleaned and maintained the Catch Basin 4th Q 2022 Level 1 Corrective Action Copper with a concentration of 16.1 ug/L exceeded the benchmark of 14 ug/L and Zinc with a concentration of 132 ug/L exceeded the benchmark of 116 ug/L. Replaced the pillow media and added a thicker membrane. 											

INSPECTION/OBSERVATIONS

Inspection: Upon arrival, Ecology inspectors Jessica Kasmari and David Adler met Wes Himes, the Compliance and Purchasing Manager for the facility. Plymouth Poultry occupies 4 different parcels. There is 1 building on each parcel and the buildings are connected internally. The property is abutting Oregon Street to the north, Airport Way to the east, Snoqualmie St to the South and 7th Ave to the West. There is a separate facility located on the corner of 7th and Snoqualmie that is not associated with Plymouth Poultry and this ISGP. We began with a review of documents.

Onsite Document Review:

- SWPPP: is out of date and should be updated to account for the changes. For example, no more fueling of trucks, no longer washing trucks on-site, the shop maintenance area is moving off-site. In addition, update the contact information and remove any unnecessary BMPs and add any necessary new BMPs.
- 2022 DMRs: Should be on-site for the entire permit cycle. They have been submitted electronically for each quarter of the current permit.
- Laboratory documents: were available upon my request.
- Monthly Inspection Reports: have been conducted and noted when the media was changed in the catch basins.
- Monthly receipts for sweeping events: increased sweeping from quarterly to monthly.
- Annual training logs: completed.
- Discussed the Administrative Order that J. Kasmari brought along: I asked if the operation and maintenance manuals were submitted. Mr. Himes indicated the information was uploaded to the portal and J. Kasmari found and verified the manuals are in PARIS and submitted on 1/28/2021. J. Kasmari asked if the roof has been recoated as per the AO. Mr. Himes indicated ½ the roof has been recoated and he sent documentations and photographs to Ben Billick. Mr. Himes mentioned there is old refrigerator equipment on the roof that will be removed and replaced in May of 2023. Mr. Himes also indicated they may replace the roof in May of 2024 as part of the refrigerator equipment replacement project. Mr. Himes will re-send documents of the roof coating if Ecology is unable to locate the physical documents. Mr. Himes indicate there are media filled booms on the roof at each downspout to filter any potential metals. Mr. Himes will include boom inspections in his monthly inspection reports.
- Older version of the permit: An older version of the permit was available; Ecology indicated the current version is required to be available.
- Site map and aerial photo: it was not clear from the site map, how stormwater travels. While catch basins, downspouts and sampling locations were included. It is lacking the flow direction and the discharge points. While it was unclear during the time of the inspection. After the inspection, J. Kasmari utilized the SPU GIS data base and the downspouts located along Airport Way S, drain into the stormwater system on Airport Ways S. the downspouts along Snoqualmie St drain into the stormwater system along Snoqualmie St and the downspouts and catch basins located along 7th Ave, discharge into the stormwater system along 7th Ave, which eventually drains into the Duwamish River.
- Spill Log: There was no spill log. Mr. Himes stated there hasn't been any spills. I indicated there should be a log present in case of spills.

Facility Inspection:

- All downspouts leading from the roof go directing into the subsurface. After the inspection, J. Kasmari reviewed Seattle Public Utility website and it appears the downspouts enter into SPU stormwater conveyances. The downspouts for the overhang on the truck bay, discharge to the paved surface and into the catch basins.
- Each catch basin had a boom and recently replaced filter media.
- The dumpsters were covered.
- No fueling station was observed as per Wes Himes, the underground storage tank was removed.
- Inside the shop was an above ground storage tank near the garage door. It was unknown if used motor oil was in the tank or not. Mr. Himes indicated they no longer used the tank, and it will be pumped out this week. There is an oil/water separator in the shop and all drains lead to the oil water separator.
- Plymouth Poultry owns dirt lot across Snoqualmie Street. In the past this area was used to wash vehicles. They no longer wash vehicles at this location, and it used for parking.
- The generator is located near Oregon street and is in its own containment.

Closing Meeting: We discussed the importance of a good site map. The SWPPP should be updated to indicate no fueling on -site. The contacts in the SWPPP should be updated. As per Wes Himes, the SWPPP will be updated in April when the shop will be empty.

Section D: Compliance/Recommendations**Compliance Requirements**

Administrative Order: As per the order, dated January 7, 2021, the roof needs to be recoated, not just a portion as described during the time of the inspection and in a follow-up email on March 7, 2023. Complete recoating the roof to comply with the order. Email photos and a map where the photos were taken.

SWPPP/Recordkeeping

- 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.
- In accordance with **S9.D.1.c and S9.D.1.i**, Records retention a copy of sampling and laboratory reports shall be retained on site for a minimum of 5 years.
- In accordance with **S9.D.1.a**, Records retention a copy of the permit shall be retained on site for a minimum of five years.
- In accordance with **S3. B.4.i.4).i)**, Spill Prevention and Emergency Cleanup Plan: maintain a spill log that includes the date, time, location, amount, and reason for spill; and the date time the cleanup completed and the staff involved.
- In accordance with **S3.B.1**, the following items needed to be added to the facility map: The Seattle Public Utility website illustrates the stormwater and sewer connections around the property and indicates the flow direction of stormwater: Utilize the following website [DSO Water & Sewer Map \(seattle.gov\)](https://www.seattle.gov/util/DSO-Water-Sewer-Map) and the permit criteria below to create a new map.
 - The scale or include relative distances between significant structures and drainage systems.
 - The size of the property in acres.
 - The location and extent of all buildings, structures and all impervious surfaces.
 - Direction of stormwater flow (use arrows).
 - Include direction of surface flow and direction of stormwater flow within conveyances
 - Locations of all structural source control BMPs.
 - Locations of all receiving water (including wetlands and drainage ditches) in the immediate vicinity of the facility.
 - Conditionally approved non-stormwater discharges.
 - Areas of existing and potential soil erosion that could result in the discharge of a significant amount of turbidity, sediment, or other pollutants.
 - Locations of all stormwater conveyances including ditches, pipes, catch basins, vaults, ponds, swales, etc
 - Locations of actual and potential pollutant sources.
 - Locations of all stormwater monitoring points.
 - The stormwater drainage areas for each stormwater discharge point off site (including discharges to groundwater).
 - 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.
 - Combined sewers or MS4s and where stormwater discharges to them.
 - Locations of fueling and vehicle maintenance areas.
 - Locations and sources of run-on to your site from adjacent properties that may contain pollutants.

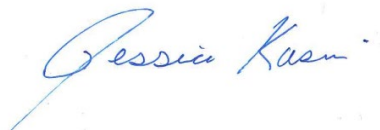
Recommendations:

- 1.) Provide documentation the used motor oil tank is empty, and batteries were removed, per Mr. Himes suggestion of removing the batteries and emptying to tank.
- 2.) Provide documentation of the removal of the underground storage tank
- 3.) After speaking to Wes Himes on 4/3/23, Ecology recommends the following: Mr. Himes confirmed the downspouts are 20-30 years old and galvanized. We recommend replacing the downspouts. If zinc levels are still high after the downspout replacement. Ecology recommends sampling 3 other downspouts with a total of 4 downspouts. One sample for each roof.

For questions about this report, please contact Ecology Inspector Jessica Kasmari at Jessica.Kasmari@ecy.wa.gov (206) 594-0000 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.

Signatures

4/5/23

Jessica Kasmari
Industrial Stormwater Inspector
Water Quality Program

Date

PHOTO ADDENDUM – PLYMOUTH POULTRY

ALL PHOTOS TAKEN BY JESSICA KASMARI ON 3/3/2023

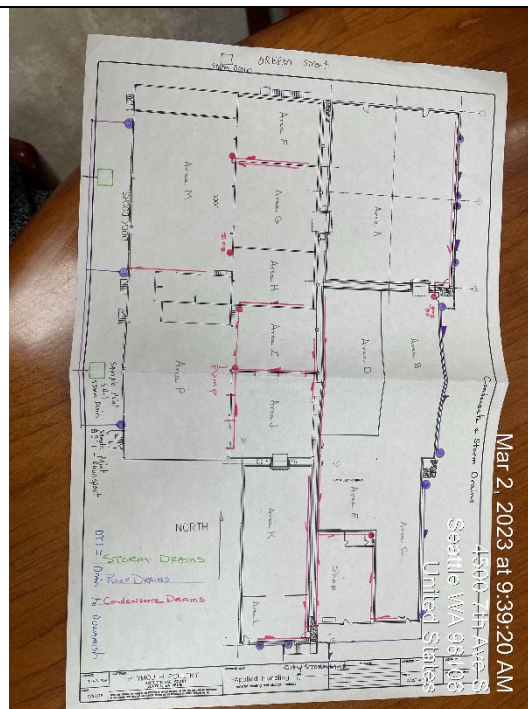
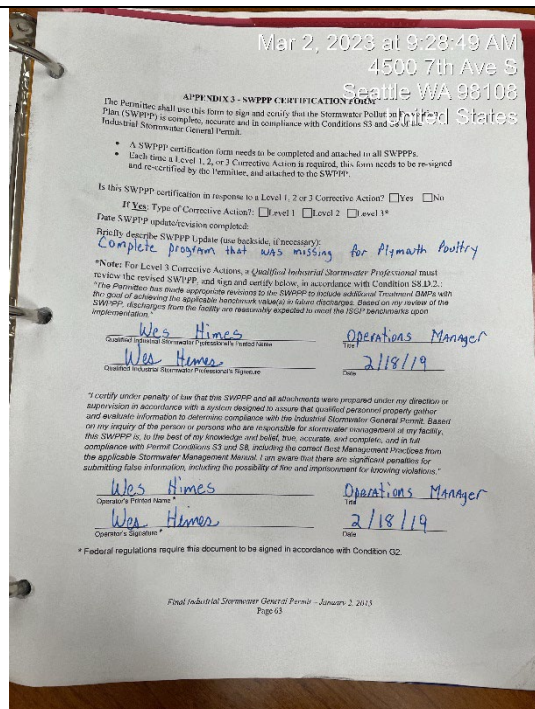


PHOTO 1

DESCRIPTION: Most recent update of the SWPPP

PHOTO 2

DESCRIPTION: Site Map



PHOTO 3

DIRECTION: 7th Avenue

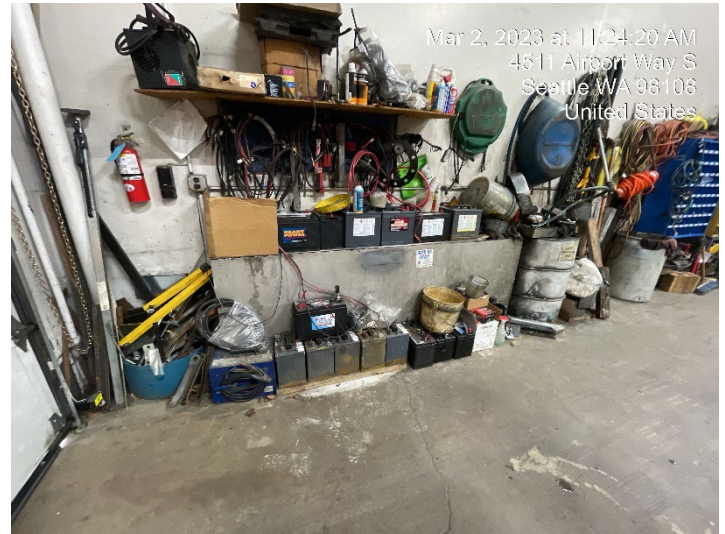
DESCRIPTION: SAMPLE LOCATION SD-1



PHOTO 4

DIRECTION: 7th Avenue

DESCRIPTION: SAMPLE LOCATION DS-1

**PHOTO 5****LOCATION:** Snoqualmie Street**DESCRIPTION:** Downspout leading directly into subsurface**PHOTO 6****LOCATION:** GARAGE/SHOP**DESCRIPTION:** Used Motor oil tank near garage door