

	State of Washington Department of Ecology WASTEWATER TREATMENT PLANT COMPLIANCE INSPECTION REPORT	Northwest Regional Office PO Box 330316 Shoreline, WA 98113 ph: (206) 594-0000 (rev. 5-28-21)
	Section A: General Information	

Report Version	PERMIT #	mm/dd/yy	Inspection Type	Inspector Code	Facility Type
<input checked="" type="checkbox"/> New <input type="checkbox"/> Changed <input type="checkbox"/> Deleted	ST0007316	5/10/2023	I	S	<input checked="" type="checkbox"/> <u>2 Industrial</u>
Remarks					
Inspection work days	Facility Self-Monitoring	Photos Taken	Samples Taken	BI	QA
0.5	5.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	N	N

Lead Ecology Inspector(s)
Maia Hoffman, Cody Ennis

Section B: Facility Data		
Name, Location, and Phone of Facility Inspected Artisan Finishing, Inc 14219 Smokey Pt Blvd Bldg 6 Marysville, WA 98271	Entry Time	Permit Effective Date
	Exit Time	Permit Expiration Date
Name(s) of On-Site Representative(s) Tyler Brown Barb Brown	Ecology Staff On-Site Maia Hoffman, Pretreatment Engineer Cody Ennis, ISGP Inspector	
Name, Title, Address, and Phone of Responsible Official Tyler Brown, Owner 14219 Smokey Pt Blvd Bldg 6 Marysville, WA 98271 (360) 658-0686	Other Facility Data 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 type="checkbox"/>	Flow Measurement	<input checked="" type="checkbox"/>	Operations & Maintenance	<input type="checkbox"/>	CSO/SSO (Sewer Overflow)
<input checked="" type="checkbox"/>	Records/Reports	<input type="checkbox"/>	Effluent ○ Receiving Water	<input type="checkbox"/>	Sludge Handling/Disposal	<input type="checkbox"/>	Pollution Prevention
<input checked="" type="checkbox"/>	Facility Site Review	<input type="checkbox"/>	Compliance Schedules	<input checked="" type="checkbox"/>	Pretreatment	<input type="checkbox"/>	Multimedia
<input checked="" type="checkbox"/>	Self-Monitoring Program	<input type="checkbox"/>	Laboratory	<input checked="" type="checkbox"/>	Storm Water	<input type="checkbox"/>	Other

Section D: Summary of Findings/Comments
<p>I. INTRODUCTION Ecology inspectors, Maia Hoffman and Cody Ennis, conducted a compliance review and complaint investigation inspection at Artisan Finishing on 5/10/2023. The focus of this inspection was on wastewater pretreatment operations and outdoor industrial activities. This inspection was announced to and coordinated with Tyler and Barb Brown via a phone call on 5/9/2023 as well as a follow up email.</p> <p>II. RESULTS AND DISCUSSION</p> <p><u>Industrial Processes and Wastewater Pretreatment:</u> Artisan Finishing is a metal finishing job shop. Artisan Finishing conducts metal preparation followed by electrostatic powder coating or painting.</p> <p>The metal preparation processes generate wastewater from the rinsing operations. Prior to metal preparation, any shipping aids, such as plastic sheeting, are removed from the parts. If necessary to remove any residue, metal parts are wiped with a 50/50 xylene/MEK blend and allowed to dry. Metal parts are then hung on a rack and dipped in one or more of the process baths followed by one or two rinses. Detailed information on the process is available in the fact sheet to the permit, https://apps.ecology.wa.gov/paris/DownloadDocument.aspx?id=384709. Caustic and acidic rinses are routed to the pH adjustment tank, through a sedimentation tank, and then discharged to the sewer. Chromium containing rinses are treated in</p>

the chrome reduction tank (reducing Cr-VI to Cr-III), then to the pH adjustment tank, sedimentation tank, and discharged to the sanitary sewer. Sludge generated in the chrome reduction process is dewatered in a filter press and disposed of off site. Supernatant from the filter press is routed back to through the chrome reduction treatment process.

The caustic, acid, and chrome process baths are never discharged to the sewer. On occasion, these tanks may need to be cleaned out. If clean out is necessary (for example, the caustic tanks accumulate sludge over time), the liquid chemical is pumped to Tank 6. Tank 6 is typically empty, but is used to accumulate liquids for clean outs or other spills as necessary. Once the liquid is removed, the sludge is manually removed and placed into barrels for disposal as hazardous waste. Then, the liquid is pumped back into the process tank and refreshed with additional chemical and water to reach the necessary depth and chemical composition. The caustic process tank was cleaned out in April 2023. T. Brown stated the acid and chrome baths require very infrequent cleaning because they do not accumulate sludge like the caustic bath. There is no wastewater generated from these tank clean outs.

Tyler and Barb Brown purchased Artisan Finishing in 2021. Over the past two years, they have made many safety and environmental improvements to ensure compliance and a safe workplace. Specific to the wastewater permit, the following improvements and changes were reviewed and discussed.

- Implementation of daily and weekly checks of the metal preparation line and wastewater pretreatment equipment.
- Daily calibration of a handheld pH meter. Artisan Finishing utilizes a continuous pH meter for compliance monitoring. Employees check the pH of the effluent with the handheld meter daily to confirm the continuous pH meter accuracy.
- A lid was fabricated for the pH adjustment tank to stop splashing.
- Implementation of sludge depth in sedimentation tank and periodic clean outs. T. Brown stated a probe is used to determine the depth of sludge in the baffled sedimentation tank. Periodically, sludge is removed from the tank, allowed to settle, water is pumped off to Tank 6, and the sludge is disposed of off site.
- All spills, leaks, or potentially contaminated wastewater in the bermed area is routed to Tank 6. All wastewater in Tank 6 is routed for treatment through the chrome reduction process as extra precaution.
- Repaired exhaust fans.
- Repaired and replaced filter on the laminar flow fume evacuation system for the chrome process tank. Cr-VI fumes are toxic, the fume system removes these fumes. T. Brown stated the contaminated air is water scrubbed. Very limited wastewater is discharged from this system (most water evaporates), but if necessary is routed to Tank 6 for chrome reduction treatment.

Total toxic organic (TTO) monitoring:

M. Hoffman discussed TTO monitoring with B. Brown.

Artisan Finishing uses ALS Everett for sample analysis. ALS Everett has been using EPA8260M for TTO analysis. Method 8260 is a TTO method used for solid waste matrix, 8260M is likely a modified method the lab uses to employ this method for a non-potable water matrix.

The permit requires Artisan Finishing to use 40 CFR Part 136 approved (Clean Water Act approved) methods for the analysis of compliance samples. Additionally, the permit requires Artisan Finishing to use a lab that is accredited for the appropriate methods. Recommended approved methods are listed in Appendix A of the permit. Method 8260M is not a 40 CFR Part 136 approved method for permit compliance. The recommended 40 CFR Part 136 approved method for TTOs is EPA 624.1 and 625.1 in order to cover the full list of TTOs in the permit. ALS Everett is not accredited for this method, but the ALS Kelso lab is. Artisan Finishing may search for labs accredited for approved methods using Ecology's lab accreditation database, <https://apps.ecology.wa.gov/laboratorysearch/Default.aspx>. The two best ways to search is by lab name (then review what parameters they are accredited for) or method (then review what labs are accredited for to perform that analysis).

M. Hoffman recommended B. Brown reach out to ALS to discuss the appropriate sampling methods used for permit compliance. Alternatively, Artisan Finishing can submit a TTO management plan for Ecology approval. Once approval is received, Artisan Finishing can certify to following the plan in lieu of TTO monitoring. See permit condition S9 for this allowance.

Complaint Investigation:

On 5/2/2023 via email, Ecology was informed by Puget Sound Clean Air Agency (PSCAA) of a complaint against Artisan Finishing. The complaint alleged "ongoing practices of improper storage and disposal of caustic waste (air emissions, dumping to gravel parking lot, storage of drums outside)".

Artisan Finishing informed Ecology that they cleaned out the caustic process tank in April 2023. During tank clean outs, employees remove accumulated sludge from the tanks. The sludge is accumulated in barrels indoors. When 4 barrels are full, or the job is complete, up to 4 barrels are shrink wrapped on a pallet. In order for the dangerous waste hauler to pick up the

palletized, wrapped barrels, Artisan Finishing must move the pallets to the garage across the driveway. Several hours before the pick up is scheduled, an employee will move the barrels to the garage via forklift. The hauler will then pick up the pallets from the garage. B. Brown stated she was present for the transfer of pallets to the garage and for the hauler pick up. She stated that they inform the hauler that a storm drain is nearby. At the time of inspection, Artisan Finishing was working with an Ecology Hazardous Waste inspector to ensure the process and staging of dangerous waste in the garage is compliant.

Ecology inspectors did not observe any evidence that caustic waste was spilled to the ground or improper storage of waste or barrels during this inspection.

Stormwater:

This inspection was also performed for the purpose of determining if the Artisan Finishing facility needs coverage under the Industrial Stormwater General Permit (ISGP). The facility lists its NAICS code as 332813, Electroplating, Plating, Polishing, Anodizing, and Coloring, with SIC code 3471, Electroplating, Plating, Polishing, Anodizing, and Coloring, which are consistent with the activities observed onsite. Per Table 1 of the ISGP, facilities performing activities under or similar to the 332XXX NAICS group require ISGP coverage. The industrial processes largely take place indoors; however, the facility has loading/unloading activities and stored industrial materials that are not under cover. This makes the facility ineligible for the Conditional No Exposure Exemption under the ISGP.

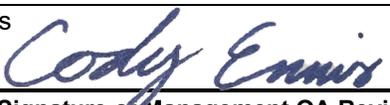
- The loading and unloading activities that were described by T. and B. Brown, detailed the movement of wrapped and secured drums of hazardous waste (HW) from the main facility to the storage garage, just south of the main facility. These drums are wrapped and placed on a wooden pallet, which is then moved by forklift for temporary holding in the garage. Once the HW is ready to be hauled away, the pallet of drums is removed from the garage and loaded onto a truck by forklift. The immediate area outside of the garage is not protected from truck traffic. This process does not currently have secondary containment, although T. and B. Brown stated that secondary containment is being considered. A storm drain is near this loading activity and a spill in this area would likely flow into this storm drain.
- Additional movement of powder coat paint were described by T. and B. Brown to take place to and from the facility and the garage. The paint, stored in lined boxes, is moved to and from the facility and garage on an as needed basis; this activity is not performed under cover.
- Several empty drums, wooden pallets, and metal products are stored outside the eastern portion of the building, uncovered and exposed to precipitation.

Please apply for the ISGP within 30 days of receiving this inspection report.

III. CONCLUSION

Artisan Finishing is a well run metal finishing facility. T. and B. Brown have made many operational and safety improvements to ensure compliance with the wastewater permit (ST0007316) as well as other applicable regulations. Ecology did not observe any environmental concerns related to a recent complaint. Ecology has the following action items for Artisan Finishing from this site visit.

- Artisan Finishing must apply for coverage under the Industrial Stormwater General Permit.
- Artisan Finishing must review the TTO analytical method used by their lab. Alternatively, Artisan Finishing may (but is not required to) submit a TTO management plan, see permit condition S9. Submittal of a TTO management plan would allow Artisan Finishing to certify they are following the plan instead of semi-annual TTO monitoring.

Name(s) and Signatures of Inspector(s)	Agency/Office/Telephone	Date
Maia Hoffman 	WA Dept. of Ecology, NWRO, (425) 507-5681	5/17/23
Cody Ennis 	WA Dept. of Ecology, NWRO, (425) 395-5694	5/17/23
Name and Signature of Management QA Reviewer	Agency/Office/Telephone	Date
Chris Martin	WA Dept. of Ecology, NWRO, (206) 594-0000	5/17/23

ANNOUNCED Inspection

INSTRUCTIONS

Section A: General Information

Report Version: N for 1st version, C for Changed or amended, or D for Delete

NPDES Permit No.: Enter the facility's NPDES or State permit number.

Inspection Date: Insert the date entry was made into the facility. Use the month/day/year format (e.g., 06/30/04 = June 30, 2004).

Inspection Type: Use one of the codes listed below to describe the type of inspection:

A Performance Audit	L Enforcement Case Support	2 IU Sampling Inspection
B Compliance Biomonitoring	M Multimedia	3 IU Non-Sampling Inspection
C Compliance Evaluation (non-sampling)	P Pretreatment Compliance Inspection	4 IU Toxics Inspection
D Diagnostic	R Reconnaissance	5 IU Sampling Inspection with Pretreatment
E Corps of Engineers Inspection	S Compliance Sampling	6 IU Non-Sampling Inspection with pretreatment
F Pretreatment Follow-up	U IU Inspection with Pretreatment Audit	7 IU Toxics with Pretreatment
G Pretreatment Audit	X Toxics Inspection	
I Industrial User (IU) Inspection	Z Sludge	

Inspector Code: Use one of the codes listed below to describe the *lead agency* in the inspection:

C - Contractor or Other Inspectors (Specify in Remarks Columns)	N - NEIC Inspectors
E - Corps of Engineers	R - EPA Regional Inspector
J - Joint EPA/State Inspectors - EPA Lead	S - State Inspector
	T - Joint State/EPA Inspectors - State Lead

Facility Type: Use one of the choices below to describe the facility.

- 1 - Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 - Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 - Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 - Federal. Facilities identified as Federal by the EPA Regional Office

Remarks: These columns are reserved for remarks.

Inspection Work Days.: Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, travel time and preparation time. This estimate does not require detailed documentation.

Facility Evaluation Rating: Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Quality Assurance Data Inspection. Enter Q if the inspection was conducted as follow-up on quality assurance sample results. Enter N otherwise.

Photos Taken: Yes or No

Samples Taken: Yes or No

Lead Ecology Inspector: Enter lead inspector's name

Section B: Facility Data

This section is self-explanatory except for: "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, and other updates to the record), e-mail addresses...; and "Ecology Staff On-Site", which may include staff names, titles, phone numbers, or e-mail addresses.

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary.

Section D: Summary of Findings/Comments

Support the findings, as necessary, in a narrative report. Use the headings given on the report form (staffing, back-up power) as appropriate. Reference a list of attachments, such as completed checklists, photos, lab reports, etc. Use extra sheets as necessary.