

		STORMWATER COMPLIANCE INSPECTION REPORT			WADOE Stormwater										
		State of Washington Department of Ecology P.O. Box 330316, Shoreline, WA 98133-9716			Phone: (206) 594-0000										
Section A: General Data															
Inspection Date 9/8/2023	CNE # CNE126912	County Snohomish	Receiving Waters Unknown ditch	Inspector Cody Ennis	Facility Type Industrial										
Discharges to: Surface Water <input checked="" type="checkbox"/> Ground Water <input type="checkbox"/>				Unannounced Inspection											
Section B: Facility Data															
Name and Location of Site Inspected				Entry Time	Permit Effective Date										
Ocean Beauty Seafoods 14651 172 nd Dr SE Monroe, WA 98272				10:45am	N/A										
				Exit Time	Permit Expiration Date										
				11:30am	N/A										
On-Site Representative(s): Name(s)/Title(s)/Contact number(s) or E-mail				Additional Participants:											
Zach Kunz Zach.kunz@oceanbeauty.com				Rose Propst (ECY)											
Mailing Address of Responsible Official(s):				Weather: Sunny											
14651 172 nd Dr SE, Monroe WA 98272				<table border="0"> <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															
Background															
<p>Washington Department of Ecology (Ecology) received an application for a Conditional "No Exposure" Exemption (CNE) from Ocean Beauty Seafood (the facility). Cody Ennis and Rose Propst from Ecology performed a compliance assistance inspection at the facility to determine if the facility's request for a CNE can be approved or denied, as applicable under the Industrial Stormwater General Permit (ISGP).</p>															
Inspection/Observations															
<p>Ecology inspectors Cody Ennis and Rose Propst met Zach Kunz at Ocean Beauty Seafoods for a compliance inspection to determine if the facility met the criteria for a CNE application. Rose and I met Zach Kunz inside the office, and we explained the reason for the inspection.</p> <p>We began the inspection at the south side of the building where a wastewater treatment tank was located [photo 001]. Zach explained that this tank partially treated the facility's process wastewater; The facility has the Ecology pretreatment permit ST0007377. Zach further explained that this treatment tank was temporary and that they plan to install permanent treatment indoors. The tank drains into the facility's wastewater treatment vault and then to the sewer connection, located on the west side of the building [photo 002]. Next to the vault, an open pipe had material in it [photo 003]. Zach stated that he did not know where that pipe went nor where it flowed from. Some material was located on the ground next to the sewer connection and the open pipe [photo 004]. Zach stated that the material was likely left over from cleaning out the process wastewater vault to the sewer.</p> <p>We then moved back to the south end of the building, to the loading dock. The loading dock had a large oily stain, upslope of the trench drain [photo 005]. The dock had an open, trench drain that led to a sump [photo 006, 007, 008]. The interior of the trench drain contained material; Zach stated that they had to clean the drain occasionally due to buildup. Zach stated that this sump contains a pump which pumps water to the catch basin located in the parking lot south of the loading docks. This catch basin sump contained debris as well as standing water [photo 009]. Maps provided by the City of Monroe confirm this catch basin connects to a stormwater ditch off the property.</p> <p>When we looked above the loading dock drain system, we observed a storage unit overhanging the sump. This unit had wooden slat flooring that had oily stains [photo 010] and was enclosed on three sides with a roof. Zach stated that a leaky forklift caused these stains. This unit also stored a tank of waste material labeled "Smoke Room Liquid Excel Precipitator Chemical Tank" [photo 011] on a plastic pallet.</p> <p>We then continued to the east side of the building where Rose observed oily stains on the pavement near the southeast corner of the building [photo 012] that are reportedly from the leaky forklift. Three air compressors sit directly adjacent to the east side of the building, under cover [photo 013]. One of the air compressors had a large oily stain on its tank and the ground underneath and around it [photo 014]. Zach explained that the compressor experienced a failure, and the tank</p>															

received a new compressor unit. In this covered area, a blue drum, with unknown contents, stood next to a tank, not in secondary containment [photo 015].

Two condenser units stood along the northeastern side of the building, north of the compressors [photo 016]. We observed several stacks of wooden pallets staged directly east of the condensers [photo 017] Fish off-cuts laid on the ground on the drive up the east side of the building [photo 018]. Zach stated that to maintain food safe conditions, the third-party that purchases the off-cuts must handle and load them outside of the building. In this same area, a plumber truck was parked and in the process of cleaning the floor drains inside the building and scrap metals lay on pallets [photo 019]. Zach explained that the water from the drain cleaning was going to their wastewater stream.

We then moved back to the parking lot, to the catch basin located near the southeast corner of the property. This catch basin had active flow, despite the lack of rain. Zach stated that they use sprinklers on the roof to keep the refrigeration units' condensers cool. This water then flows through the roof's downspouts and into the storm drains [photo 020]. This storm drain flows into the first observed storm drain noted in Photo 009.

We then moved towards the northwest corner of the building where we observed water flowing through the ditch and into a culvert. We then discussed the inspection, next steps for the CNE, and then concluded the inspection.

CNE Eligibility Questions – Onsite Verification

	<u>Yes</u>	<u>No</u>	<u>Photo</u>
Is anyone using, storing, or cleaning industrial machinery or equipment in an area that is exposed to stormwater, or are there areas where residuals from using, storing, or cleaning industrial machinery or equipment remain and are exposed to stormwater?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Photo 010
Are there materials or residuals on the ground or in stormwater inlets from spills/leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Photo 009
Are materials or products from past industrial activity exposed to precipitation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Is material handling equipment used/stored (except adequately maintained vehicles)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See inspection narrative.
Are materials or products exposed to precipitation during loading/unloading or transporting activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Photo 018
Are materials or products stored outdoors (except final products intended for outside use, e.g., new cars, where exposure to storm water does not result in the discharge of pollutants)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Are materials contained in open, deteriorated, or leaking storage drums, barrels, tanks, and similar containers?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Are materials or products handled/stored on roads or railways owned or maintained by the discharger?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Is waste material exposed to precipitation (except waste in covered, non-leaking containers, e.g., dumpsters)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Photo 018
Does the application or disposal of process wastewater occur (unless otherwise permitted)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See inspection narrative.
Is there particulate matter or visible deposits of residuals from roof stacks/vents not otherwise regulated, i.e., under an air quality control permit, and evident in the storm water outflow?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Section D: Compliance/Recommendations

Based on observations made during the onsite CNE verification inspection and communication with facility management, I recommend denial of this facility's conditional no exposure exemption application.

Violations:

1. Discharges of pollutants to water: Water used to cool the condensers on the roof is considered process water. Discharge of process water to stormwater is considered an illicit discharge.

- a. Chapter 173-226 Washington Administrative Code (WAC) requires that no pollutants shall be discharged to waters of the State from any point source, except as authorized by a permit.
 - b. Chapter 90.48.080 Revised Code of Washington (RCW) prohibits the discharge of polluting matter into waters of the state.
 - c. Required corrective action: Ocean Beauty Seafoods must stop discharging process water into stormwater.
2. Industrial Stormwater General Permit Condition: In accordance with permit condition S1.A.1., facilities engaged in any industrial activities in Table 1 and facilities with a significant contribution of pollutants to waters of the State shall apply for coverage if stormwater from the facility discharges to a surface waterbody, or to a storm sewer system that discharges to a surface waterbody. The current Industrial Stormwater General Permit and Table 1 can be found at: <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Industrial-stormwater-permit> ("Current Permit")
- a. Ocean Beauty Seafoods engages in food manufacturing activities, which is in the list of activities requiring permit coverage. The permit requires Ocean Beauty Seafoods to apply for the ISGP.
 - b. Required Corrective Action: Within 30 days of receipt of this inspection report, Ocean Beauty Seafoods must apply for the Industrial Stormwater General Permit (ISGP).

Industrial Stormwater General Permit Application Information ("Apply"):

<https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Industrial-stormwater-permit>

For questions about this report, please contact Ecology Inspector Cody Ennis at cody.ennis@ecy.wa.gov, (425) 395-5694

Cody Ennis *Cody Ennis* 9/26/2023
 Industrial Stormwater Inspector
 Water Program

Rose Propst *Rosemary Propst* 9/26/2023
 Rose Propst
 Industrial Stormwater Inspector
 Water Program

**Photo Addendum – Ocean Beauty Seafoods
all photos taken on 8/16/2023**



Photo 001
Direction: West
Description: A wastewater treatment tank located on the south side of the building.
Photo by Rose Propst

Photo 002
Direction: East
Description: The wastewater treatment tank is piped into the sewer inlet.
Photo by Cody Ennis

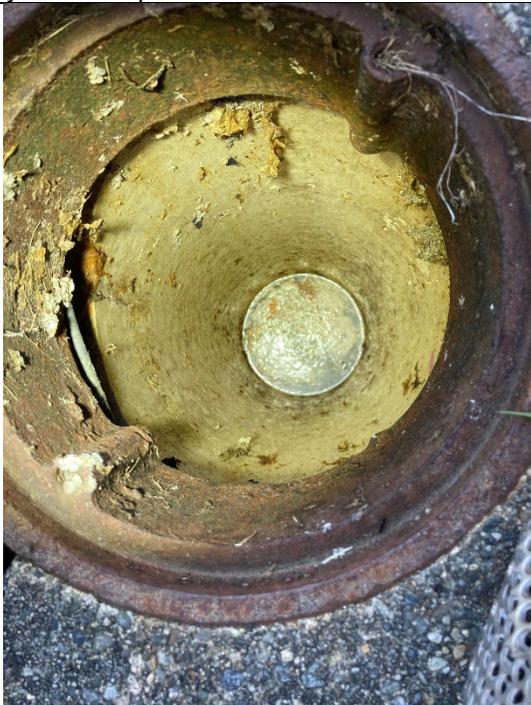


Photo 003
Direction: N/A
Description: An open-top pipe near the sewer inlet. Liquid with an unknown substance is on the surface.
Photo by Rose Propst



Photo 004
Direction: N/A
Description: Some debris left over from cleaning operations of the sewer inlet.
Photo by Rose Propst

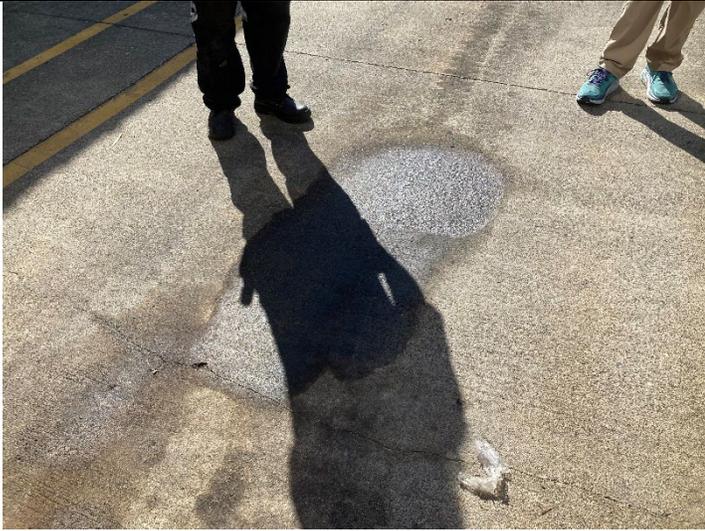


Photo 005
Direction: South
Description: A large oily stain on the loading dock pavement.
Photo by Rose Propst



Photo 006
Direction: East
Description: A trench drain at the lowest point in the loading dock. Flows from west to east.
Photo by Rose Propst



Photo 007
Direction: East
Description: A closeup of material buildup in the trench drain.
Photo by Rose Propst



Photo 008
Direction: East
Description: A sump on the east most side of the trench drain. Sump is stated to be pumped into the catch basin further south in the parking lot.
Photo by Rose Propst

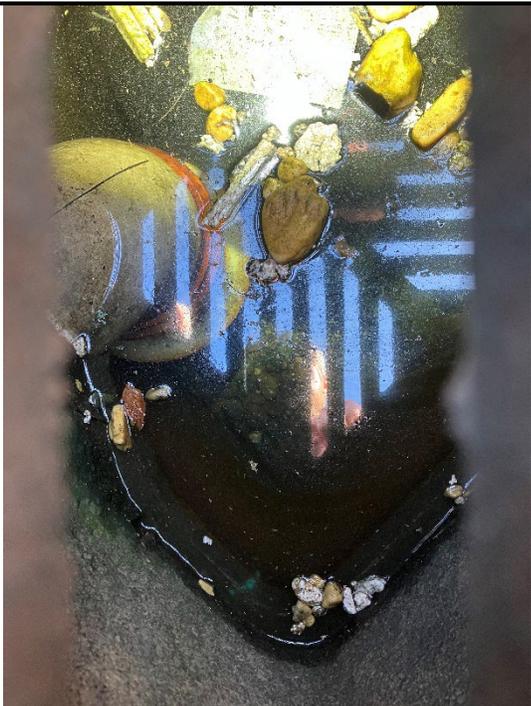


Photo 009
Direction: N/A
Description: Inside the catch basin that the sump is pumped into. Debris and floating material can be seen.
Photo by Cody Ennis

Photo 010
Direction: West
Description: Oily stains on the wooden floor of the storage container. Container is located above the loading dock sump.
Photo by Rose Propst



Photo 011
Direction: West
Description: A polymer tank, filled with liquid chemical, stored in the storage container.
Photo by Rose Propst

Photo 012
Direction: North
Description: Oily stains present on the pavement, east of the building.
Photo by Rose Propst



Photo 013
Direction: West
Description: Three air compressors on a concrete pad and covered by a permanent structure.
Photo by Cody Ennis



Photo 014
Direction: West
Description: One compressor that had large oily stains on the tank, surrounding pad, and gravel.
Photo by Cody Ennis



Photo 015
Direction: Southwest
Description: Blue drum containing an unknown liquid. The blue hose leads into the air compressors.
Photo by Cody Ennis



Photo 016
Direction: Northwest
Description: Two condensing units for internal refrigeration systems on the east side of the building.
Photo by Cody Ennis



Photo 017
 Direction: South
 Description: Stacks of pallets present by the condensers and compressors.
 Photo by Cody Ennis

Photo 018
 Direction: North
 Description: Fish off cuts laying on the ground. Green totes used to carry the offcuts are present.
 Photo by Cody Ennis



Photo 019
 Direction: Northwest
 Description: A stack of scrap metal is present along with more green totes. A plumber is performing maintenance to the building's internal floor drain system.
 Photo by Rose Propst



Photo 020
 Direction: N/A
 Description: The inside of the catch basin on the south east side of the parking lot. The ripples in the reflection are caused by water flowing from the roof condenser sprinkler system.
 Photo by Cody Ennis