



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office

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

July 9, 2024

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 (Ecology) recent National Pollutant Discharge Elimination System (NPDES) Industrial Stormwater General Permit (ISGP) compliance inspection conducted virtually at Milgard Essence / WAR000074 on May 23, 2024. Thank you for the time, Lucas Samuel spent with me during my visit.

Please contact me at 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: Lucas Samuel, Milgard



Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Cod	NPDES	yr/mo/dy	Inspection Type	Inspector	Facility Type	
1 N	5	W A R 0 0 0 0 7 4	2 0 2 4 0 5 2 3	0 C	S	2

Weather- Partly cloudy and approximately 65° Fahrenheit
0.0" precipitation in previous 24 hours

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time/Date	Permit Effective Date
Milgard Windows Essence	10:00a.m.	January 1, 2020
910 54th Avenue East	05/23/2024	
Fife, WA 98424	Exit Time/Date	Permit Expiration Date
	10:40a.m.	December 31, 2024
	5/23/2024	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number	Other Facility Data (e.g., SIC NAICS, and other description information)	
Lucas Samuel, Environmental, Health & Safety Manager	This facility occupies 7.8 acres	
Phone: (253)-921-2171	North American Industry Classification System (NAICS):	
Email: LucasSamuel@milgard.com	326199, All Other Plastics Products Manufacturing.	
Name, Address of Responsible Official/Title/Phone and Fax Number	327991, Cut Stone and Stone Product Manufacturing	
Dave Buffelen, Environmental Excellence Manager	Washington Tracking Network Environmental Health	
Milgard Manufacturing LLC	Disparity rank- 10	
1001 54th Avenue East		
Fife, WA 98424		
Contacted?		
Phone: (253) 330-3050		
<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes		
Email: davebuffelen@milgard.com		

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

WAR000074 authorizes Milgard Windows Essence (Milgard) to discharge stormwater associated with industrial activity and conditionally approved non-stormwater to surface waters of the state and storm systems that drain to surface waters of the state of Washington, under the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) Industrial Stormwater General Permit (ISGP).

This report contains the findings from a two-part inspection at Milgard. Prior to the onsite portion of the inspection, Lucas Samuel, Environmental, Health & Safety Manager, submitted facility records electronically for review. The findings from the records review are grouped by permit condition, below, starting at S3.

I began the inspection with a brief opening conference during which Lucas Samuel and I exchanged greetings and I shared the findings from the records review. We started the site walk on the west side of the facility, between the two buildings that comprise the facility, 910 54th Avenue East (referred to as 910 hereafter) and 1010 54th Avenue East (1010 hereafter). The facilities are (both) on the south side of 8th Street East and on the west side of 54th Avenue East. Lucas Samuel pointed out the facility's monitoring point FG2 and the associated outfall, Outfall 2. We looked at catch basin 4, one of two catch basins outfitted with treatment inserts that target zinc and explained the flow of stormwater through the site. Lucas Samuel explained that stormwater from areas where industrial activity occurs (the south and west sides of the 910 building and the north, south, and west sides of the 1010 building), is treated by an oil-water separator at catch basin 8 prior to discharge offsite through Outfall 2. Treated stormwater that discharges through

Outfall 2 enters a segment of the Fife Ditch that was impaired when authorization WAR000074 was issued and, as such, additional monitoring (ammonia) is required. Stormwater from administrative areas and the north side of 910 discharges to a City of Fife municipal separate storm sewer (MS4) ditch that does *not* enter an impaired receiving environment. Lucas Samuel and I walked around the 910 building first, then walked around the 1010 building. Lucas Samuel pointed out trash and recycle containers, all of which had storm resistant lids that were closed, 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 without 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 occur under cover, on the north side of 1010 and south side of 910. Lucas Samuel pointed out large bay doors that make up the loading zones. Loading doors have door skirts and awnings to minimize potential exposure to stormwater during loading and unloading. We looked at the Cyclone dust collection system at the southwest corner of the site. The dust collection system is enclosed by chain link fence with privacy slats. The pavement around the dust collector and waste receptacles and throughout the facility was very clean. We looked at dedicated storage sheds for tools associated with baghouse operations and maintenance.

Lucas Samuel told me that Milgard recently contracted with Jet City vacuum sweeping to increase yard cleaning to weekly, on Saturdays, and to power wash and clean the dust collection area annually, including offsite disposal of process water generated during cleaning. Lucas Samuel stated that Milgard continues to implement a successful best management practice (BMP): morning walks with staff from the surrounding Milgard facilities. During the multi-manager site walks, trash, if any, is picked up and staff share observations regarding health, safety, and environmental improvement opportunities. Lucas Samuel said that they continue to accompany contracted staff from EnCo Environmental Company when they conduct monthly inspections. Lucas Samuel said that EnCo Environmental Company technical staff collect Milgard's quarterly compliance samples.

We completed the walkthrough around 10:40 hours, I thanked Lucas Samuel for their time and attention and said that I did not note defects during the walkthrough.

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.
- SWPPP was last certified on August 05, 2021.
- 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.
- Milgard 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 when the authorization to discharge was issued.

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 November 2023 through March 2024..
- 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 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.
- Monthly inspection reports include a photo log that documents issues noted on reports.

S8. – Corrective Actions –

Not Applicable, benchmark exceedances were not reported.



S9. – Reporting and Recordkeeping –

- Documents selected for the records review were a subset of the documents ISGP S9 requires permittees to keep onsite for a minimum period of five years.
- 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, 2023, through March 30, 2024:
 - S9.B-DMRs were submitted electronically (S9.A), through the Portal, as required by S9.A.
 - S9.C- Annual Reports for 2020 and 2021 were submitted electronically, reviewed, and deemed complete.
 - S9.D- Records Retention- Records requested were provided and were a subset of those S9.D requires permittees to retain onsite.
 - In addition to records discussed above, I received and reviewed:
 - A reference document with each month's compliance certifications and signatures accompanied the monthly inspection reports I reviewed.
 - A BMP Maintenance Log for 2023- 2024. This document summarized actions taken with dates and details of tasks completed.
 - Records were extremely detailed and meticulously organized.

Requirements:

- Follow the terms and conditions of the ISGP

☐ Unannounced
☒ Announced

Name and Signature of Inspector	Agency/ Office Number	Date
Honor Carpenter 	Ecology/SWRO (360) 485-2701	06/24/2024
Signature of Management QA Reviewer	Agency/ Office Number	Date
 Sheila Spaulding General Permits Unit Supervisor	Ecology/SWRO (360) 522-2987	7/8/2024

Permit #WAR000074
Milgard Windows Essence
May 23, 2024

1. Receiving dumpsters and equipment under cover



2. Structure provides (redundant) cover for waste receptacles



3. Monitoring point FG2, west side of facility



4. Zinc treatment inserts in catch basin 4



5. Dust collection system



6. Tarped equipment and protected storage



Images have been compressed and may be cropped. Original images available by request