



STORMWATER COMPLIANCE INSPECTION REPORT

State of Washington Department of Ecology
4601 N Monroe St, Spokane, WA 99205

WADOE Stormwater
Compliance Inspection Form

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Section A: General Data

Inspection Date	NPDES Permit #	County	Receiving Waters	Inspector	Facility Type
10/23/2024		Grant	Columbia River	Suman Paudel	Industrial
Discharges to: Ground				ANNOUNCED Inspection	

Section B: Facility Data

Name and Location of Site Inspected Group 14 Technologies, Inc. (BAM-2) 13431 Wheeler Road NE, Moses Lake WA 98837	Entry Time 12:05 pm Exit Time 01:42 pm
	GPS Lat: Long: Entrance: 47.12730 -119.20450 Discharge: 47.12832 -119.21211
	On-Site Representative(s): Name(s)/Title(s)/Contact number(s) or E-mail Paul Stenhouse, (206) 385-0385 x 351, Environmental Manager, pstenhouse@group14.technology Nick Anderson, (206) 385-0385, Environmental Specialist, nianderson@group14.technology
Responsible Official(s): Paul Stenhouse, (206) 385-0385 x 351, Environmental Manager, pstenhouse@group14.technology Nick Anderson, (206) 385-0385, Environmental Specialist, nianderson@group14.technology	Samples Taken? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Photos Taken? <input checked="" type="checkbox"/> <input type="checkbox"/>

Section C: Summary of Findings/Comments

SWPPP:	Certified?	Permit:	Visual Inspections: Yes	DMRs:	Sampling kit: NA	Spill kit:
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BACKGROUND

Group 14 Technologies is establishing operations at this site, referred to as BAM-2 (Battery Active Material), where the company plans to manufacture silicon-carbon anode materials for lithium-ion batteries. The facility encompasses an area of 43 to 46 acres, as confirmed by the Environmental Manager, Paul Stenhouse. While the facility is currently not operational, it will focus exclusively on manufacturing components, rather than handling lithium or assembling batteries.

Commencement of partial operations is anticipated by the end of 2024, with the aim of producing thousands of tons of SCC55TM (Silicon Carbon Composite, with "55" denoting the number of attempts in its development), as construction of the necessary infrastructure is progressing swiftly.

I recently had the opportunity to visit the facility to engage with the operators, gain insights into its operations, assess its eligibility for an Industrial Stormwater General Permit (ISGP) as requested by Environmental Specialist, Nick Anderson, and offer any required technical assistance.

INSPECTION/OBSERVATIONS

During my visit to the facility, I documented the following information. Upon arrival, I spoke with Nick Anderson, the facility's Environmental Specialist, who introduced me to Paul Stenhouse, the environmental manager. After our introductions, we proceeded to a conference room where Marlon Young, an EHS support staff member, provided a site

orientation and safety awareness training for about 15 minutes. This training is typically given to all visitors, as confirmed by the facility representatives.

Before heading out for the site inspection with Nick and Paul, we discussed the stormwater management system as well as the functions of the buildings and plants that have been constructed, as well as those planned for construction. The representatives then began showing me around, starting from the eastern entrance.

As we moved towards Modules 1 and 2, located to the west, I observed several inlets. Upon inquiry, Nick and Paul confirmed that these were stormwater catch basins directing runoff to the stormwater infiltration pond at the far western side of the facility. While walking west, I also noticed several ongoing construction activities, including the creation of a parking lot that will also feature stormwater catch basins.

I saw a large building on my right, which the representatives identified as Module 1, with Module 2 situated immediately to the west. Additionally, I noticed generators and transformers with secondary containment close to the modules. When I inquired about the vacant space between the stormwater infiltration pond and Module 2, they explained that it is designated for the construction of Module 3 in the future. Although the stormwater infiltration pond was still unfinished, the stormwater outlets leading to it were visible. According to the representatives, Modules 4, 5, and 6 are planned for the southern side of the existing modules.

After exploring Modules 1 and 2, along with the stormwater infiltration pond, we began returning to the eastern side from where our tour started at the northern end.

Upon observing several white cylindrical tanks, I learned they are part of the Nitrogen (N₂) plant, which generates N₂ and is operated by a third party. I further asked the representatives if they planned to use any chemicals that could potentially be exposed to stormwater, and they assured me that these would be stored indoors. Regarding onsite fueling, they mentioned there are currently no plans for that. However, if such plans arise, they will ensure that any fueling operations would utilize double-walled tanks with secondary containment, similar to the generators.

As our conversation progressed, they clarified that they have primary, secondary, and tertiary plans in place for preserving stormwater. They affirmed that regardless of holding an industrial stormwater general permit, all stormwater that falls on the site either infiltrates the ground through permeable surfaces or runoff from impermeable surfaces is collected in catch basins and gravity-fed into the stormwater infiltration pond, ensuring it does not leave the property. Furthermore, they are committed to preventing stormwater pollution and ensuring groundwater quality. Employees will be trained in stormwater pollution prevention and spill response, and their stormwater management plan for the BAM-2 site has been designed in compliance with the Eastern Washington Stormwater Manual. They also verbally confirmed that Group 14 is not expected to be a significant contributor to pollution. In the event of an emergency spill, the facility is equipped with several spill kits.

Following a thorough inspection and careful review of the available information, I have determined that the facility has developed a comprehensive operational plan. The operators demonstrate a strong commitment to maintaining safe practices for both surface and groundwater and are adhering to all relevant regulatory requirements, irrespective of ISGP coverage. Consequently, the facility is not currently eligible for an ISGP. However, I intend to conduct a follow-up visit once the facility becomes fully operational to ensure that all discussed measures are effectively implemented.

Section D: Compliance/Recommendations

Citation reference	Page #	Specific Violation	Action	Due date
Condition S3.B.4.b.i.2	Pg. 12	“Good Housekeeping: The stormwater pollution prevention plan shall include Best Management Practices (BMPs) that define ongoing maintenance and cleanup, as appropriate, of areas which may contribute pollutants to stormwater	Please read and implement BMPs described in chapter S102E on page 930 of the Ecology’s Stormwater Management Manual for Eastern Washington (SWMMEW).	Recommended

		discharges.”		
Condition S3.B.4.b.i.3.b	Pg. 13	Preventive Maintenance: Maintain ponds, tanks/vaults, catch basins, swales, filters, oil/water separators, drains, and other stormwater drainage/treatment facilities in accordance with the maintenance standards	Please read and implement BMPs described in chapter S102E on page 930 of the Ecology’s SWMMEW.	Recommended
Condition S3.B.4.b.i.3.c	Pg. 13	Preventive Maintenance: Inspect all equipment and vehicles during monthly site inspections for leaking fluids such as oil, antifreeze, etc. Take leaking equipment and vehicles out of service or prevent leaks from spilling on the ground until repaired.	Please read and implement BMPs described in chapter S102E on page 930 of the Ecology’s SWMMEW.	Recommended
Condition S3.B.4.b.i.3.d	Pg. 13	Preventive Maintenance: Clean up spills and leaks immediately (e.g., using absorbents, vacuuming, etc.) to prevent the discharge of pollutants.	Please read and implement BMPs described in chapter S104E on page 932 of the Ecology’s SWMMEW.	Recommended
Condition S3.B.4.b.i.7	Pg. 15	Illicit Discharges: The Storm Water Pollution Prevention Plan (SWPPP) shall include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges, to stormwater sewers, or to surface waters and groundwaters of the State.	Please read and implement BMPs described in chapter S108E on page 936 of the Ecology’s SWMMEW.	Recommended

 Date: 11/25/2024		Reviewed and approved by:  Date: 12/3/2024	
Suman Paudel Urban Waters and Industrial Stormwater Specialist Water Quality Program		Art Jenkins Unit Supervisor Water Quality Program	



Figure 1: Construction of a parking lot on the northeast



Figure 2: The stormwater inlet/catch basin, located at the entrance on the east side.



Figure 3: Generators and transformers on the right with secondary containment



Figure 4: Module 1 and Module 2 (left)



Figure 5: Stormwater infiltration pond with an outlet



Figure 6: Stormwater infiltration pond with module 2 on the backdrop



Figure 7: Vacant lot for the construction of the module 3
Situating next to Module 2



Figure 8: Construction of roads within the property with
Nitrogen plant on left and module 1 on right