



NPDES Compliance Inspection Report

Ron and Leo's Welding Services

**NPDES Permit Tracking Number
WAU000665**

Inspection Date: 01/18/2023

Prepared by:

Kyle Masters
U.S. Environmental Protection Agency, Region 10
Enforcement & Compliance Assurance Division
Water Enforcement & Field Branch
Surface Water Enforcement Section

Inspector Signature/Date:

Masters, Jonathan	Digitally signed by Masters, Jonathan Date: 2023.03.15 12:29:22 -07'00'
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Supervisor Signature/Date:

MICHELE JENCIUS	Digitally signed by MICHELE JENCIUS Date: 2023.03.15 12:43:22 -07'00'
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I. Facility Information

Facility Name: Ron and Leo's Welding Services

Facility Owner: Mr. Ron Hardersen

Facility Address: 2201 Garrett Street
Enumclaw, Washington 98022

Mailing Address: 2201 Garrett Street
Enumclaw, Washington 98022

Facility Contact(s): Ron Hardersen, Owner
Ron and Leo's Welding Services
(360) 825-1221
ron@weldingservice.com

Latitude/Longitude: N 47.205820 W -121.982200

NPDES Tracking Number: WAU000665

NAICS Code(s): 33271002

Facility Size: 1.07 acres, approximately 0.5 acres exposed

II. Inspection Information

Inspection Date: January 18, 2023

Inspector(s): Kyle Masters, Inspector
EPA Region 10, ECAD / SWES

Matt Quarterman, Inspector
EPA Region 10, ECAD / LES

Arrival Time: 2:40 PM

Departure Time: 3:30 PM

Weather: Cloudy

Purpose: To evaluate compliance with the requirements of the Clean Water Act, the National Pollutant Discharge Elimination System (NPDES) and the State Waste Discharge General Permit for Stormwater Discharges Associated with Industrial Activities.

[Unless otherwise noted, all details in this inspection report were obtained from conversations with Ron Hardersen, or from observations made during the inspection.]

III. Permit Information

Ron and Leo's Welding Services ("Facility") currently lacks coverage under the State of Washington Department of Ecology's Industrial Stormwater General Permit (ISGP). The current version of the ISGP became effective on January 1, 2020 and expires on December 31, 2024. EPA assigned the permit number WAU000665 after this inspection for tracking purposes.

Due to the full-service small parts manufacturing, machining, and welding services occurring on-site, the Facility requires permit coverage under the ISGP. Table 1 of the ISGP, at Section S1.A., lists the types of facilities required to obtain permit coverage. Table 3, at Section S5.B., requires metal fabricators (NAICS 332xxx) and machinery manufacturers (NAICS 333xxx) to sample and follow the additional benchmark monitoring program for Lead and Petroleum Hydrocarbons.

IV. Facility Background

Ron and Leo's Welding Services began operations at this Facility approximately 15 years ago in 2008, according to Mr. Hardersen. Prior to moving there, the company operated at another facility in the area for over 30 years.

Operations at the Facility consist of mechanical repairs of client's equipment and manufacturing and modifying custom parts. Staff may manufacture, or modify existing, parts with a plasma cutter, machining tools like lathes, mills, and drills. Mr. Hardersen referred to the company as a "job shop," meaning they primarily work in custom or bespoke quantities on an as-needed basis.

Business hours are Monday through Friday, 7AM – 5PM. The Facility employees approximately six staff.

V. Inspection Chronology

This was an unannounced inspection. Before we arrived on-site, we inspected a nearby City of Enumclaw stormwater pond (**Photo 1**, also **Attachment B**). We could see where drainage from the area fed into the pond (**Photo 3**), where the pond would flow out (**Photo 2**) into waters of the state, eventually reaching Drainage Ditch 5 (**Photo 4**), and Newaukum Creek (**Attachment B**). Upon arriving on-site, Inspector Quarterman and I introduced ourselves to Mr. Hardersen. I explained I was conducting unannounced stormwater inspections in the area that day.

The inspection consisted of an opening conference, a walk-through of the Facility, the outside storage area, the adjacent stormwater catch basins and drainage ditch, and ended

with a closing conference. We were accompanied throughout the inspection by Mr. Hardersen.

VI. Opening Conference

The opening conference was held shortly after our arrival near the front desk and sign-in location. We introduced ourselves to Mr. Hardersen and I presented my inspector credentials. I explained my colleague, Inspector Quarterman and I were conducting inspections in the area. We then discussed the purpose and scope of the inspection.

During the opening conference Mr. Hardersen provided a brief background on the Facility's history and operations. He also said he received a letter from the City of Enumclaw about stormwater management concerns, but the Facility did not have a permit with the Washington State Department of Ecology.

VII. Site Review

According to Mr. Hardersen, the Facility consists of the main shop floor where staff use the plasma cutter, lathe, presses, drills, and welding equipment to manufacture or modify parts to complete work for their customers. They use the outside portion of the Facility largely for storage. As we walked through the shop, Mr. Hardersen pointed out the equipment they use for their work. We saw a large municipal solid waste truck parked inside for repair. Mr. Hardersen told us the truck used a customized arm for lifting and dumping waste containers. He and other Facility staff needed to tool a specialized part to repair the truck for their client.

We moved outside the main shop and started at the northeast corner of the Facility, working our way south. We saw two approximately 15-gallon drums, one with a hole in the center of its lid (**Photos 5-6**). Mr. Hardersen told us these drums appeared at the Facility overnight a few weeks prior to our inspection. He said he was unsure who abandoned them, though he understood his obligation to dispose of them. He told us he thought they contained grease, and that he planned to take them to a free hazardous waste disposal event hosted by the county.

As we moved south, we looked at the Facility's eastern fenceline. We saw a drainage ditch with water flowing north, towards Battersby Avenue (**Photo 7**). In the distance we also saw the municipal stormwater pond appearing to receive the flow from the ditch (**Photo 8**). Near the fence, we saw an approximately 20-foot-long roll-off container holding a variety of scrap metal (**Photos 10-11**). The roll-off lacked a lid entirely. Rust colored water pooled under the roll-off (**Photo 9**) and flowed into a nearby catch basin (**Photos 12-13**). We continued south observing a large amount of metal stored without cover (**Photo 14**), and small parts laying on the ground as debris (**Photo 15**).

Towards the southeast portion of the Facility, we observed a second catch basin receiving stormwater (**Photo 16**). Two absorbent pads lay between the catch basin and the flow. We noted an obvious sheen in the stormwater heading into the catch basin. Nearby,

against the outer wall of the Facility, we saw an oil and compressed gas cylinder storage area (**Photo 17**). We counted approximately six 5-gallon pails, one approximately 20-gallon drum, and seven 55-gallon drums. Mr. Hardersen told us about half the drums sat empty. A small portion of cover sat over the shelving; rainwater appeared to accumulate on the containers evidenced with the rusting of lids, and the visible standing water in drains designed to screw into the bungs of the drums (**Photo 19**). Immediately south of the shelving we saw a small outbuilding, additional compressed gas cylinders, and approximately five 5-gallon containers holding fuel and oil (**Photo 18**). Mr. Hardersen told us the outbuilding housed the Facility's compressor.

We expressed our concern with Mr. Hardersen at such a large amount of oil stored outside with limited cover and spill response capacity. Mr. Hardersen agreed the Facility could improve its storage, though he told us they had not had a significant spill. I pointed out the oily sheen flowing towards the catch basin and highlighted the opportunity to improve stormwater management with a more robust spill response.

VIII. File Review

I did not review permit-required records during the inspection as the Facility currently lacks ISGP permit coverage. Mr. Hardersen told us the Facility does not possess a Stormwater Pollution Prevention Plan.

IX. Areas of Concern

Observations during the inspection identified the following areas of concern

A. Industrial Stormwater General Permit Coverage

Section S1.A.1. of the Permit states, "Facilities engaged in any industrial activities in Table 1 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."

Table 1¹: Activities Requiring Permit Coverage and the Associated NAICS Groups

Industrial Activities	NAICS Groups
<i>Primary Metal Manufacturing</i>	331xxx
<i>Fabricated Metal Product Manufacturing</i>	332xxx
<i>Machinery Manufacturing</i>	333xxx

Based on our observations and conversation with Mr. Hardersen, the Facility requires permit coverage. We confirmed the Facility performs industrial activities inline with the above NAICS groups, actively stores potential pollutants outside, and stormwater leaves the Facility and discharges into a municipal storm sewer

¹ The following tables serve as excerpts to the full versions, edited for clarity, found in the Permit.

system and surface waterbodies.

B. Uncovered Scrap Metal Container

Section S3.B.4.2.d of the Permit states: “keep all dumpsters under cover or fit with a storm-resistant lid that must remain closed when not in use.”

During the inspection I observed an approximately 20-foot-long roll-off container holding scrap metal without a lid (**Photos 10-11**).

C. Solid and Liquid Waste Management

*Section S12. of the Permit states, “The Permittee shall not allow solid waste material or **leachate** to cause violations of the State Surface Water Quality Standards (Chapter 173-201A WAC), the Groundwater Quality Standards (Chapter 173-200 WAC) or the Sediment Management Standards (Chapter 173-204 WAC).*

During the inspection I observed two approximately 15-gallon drums stored outside without cover (**Photos 5-6**). The Facility also stores numerous containers of fuel and oil outside with inadequate cover and spill containment (**Photos 17-19**). Mr. Hardersen told us the drums were abandoned at the Facility.

D. Stormwater Pollution Prevention Plan (SWPPP)

*Section S3.A. of the Permit states, “All Permittees and applicants for coverage under this permit shall implement a **Stormwater Pollution Prevention Plan (SWPPP)** developed by **qualified personnel** as follows:*

*1. The SWPPP shall specify the **Best Management Practices (BMPs)** necessary to:*

- a. Provide **All Known, Available, and Reasonable methods of prevention, control, and Treatment (AKART)** of stormwater pollution.*
- b. Ensure the discharge does not cause or contribute to a violation of the Water Quality Standards.*
- c. Comply with applicable federal technology-based treatment requirements under 40 CFR § 125.3.*

Section S3.B. of the Permit states, “The SWPPP shall contain a site map, a detailed assessment of the facility, a detailed description of the BMPs, Spill Prevention and Emergency Cleanup Plan, and a sampling plan.”

During the inspection I observed a lack of Best Management Practices to control potential pollution sources. Mr. Hardersen stated the Facility lacked a SWPPP.

E. Sampling Requirements

Section S4.A. of the Permit states, “The Permittee shall conduct sampling of stormwater in accordance with this permit and the SWPPP.”

Section S4.B.1.a. of the Permit states, “The Permittee shall sample the discharge from each designated location at least once per quarter...”

Section S5.A.1. of the Permit states, “Permittees shall sample their stormwater discharges as specified in Condition S4 and as specified in Table 2.”

Section S5.A.2. of the Permit states, “Additional requirements apply to specific industrial categories (S5.B) ...”

Table 2: Benchmarks and Sampling Requirements Applicable to All Facilities

Parameter	Units	Benchmark Value	Analytical Method	Laboratory Quantitation Limit	Minimum Sampling Frequency
Turbidity	NTU	25	EPA 180.1 Meter	0.5	1/quarter
pH	Standard Units	Between 5.0 and 9.0	Meter/Paper	+/- 0.5	1/quarter
Oil Sheen	Yes/No	No Visible Oil Sheen	N/A	N/A	1/quarter
Copper, Total	µg/L	Western WA: 14	EPA 200.8	2.0	1/quarter
Zinc, Total	µg/L	117	EPA 200.8	2.5	1/quarter

Table 3: Additional Benchmarks and Sampling Requirements to Specific Industries

2. Primary Metals (331xxx), Metals Fabricating (332xxx), Machinery Manufacturing (333xxx)					
Parameter	Units	Benchmark Value	Analytical Method	Laboratory Quantitation Limit	Minimum Sampling Frequency
Lead, Total	µg/L	64.6	EPA 200.8	0.5	1/quarter
Petroleum Hydrocarbons (Diesel Fraction)	Mg/L	10	NWTPH-Dx	0.25	1/quarter

During the inspection, Mr. Hardersen confirmed the Facility does not sample stormwater discharges.

F. Facility Inspections

Section S7.A.1. of the Permit states, “The Permittee shall conduct and document visual inspections of the site each month.”

Section S7.C.1. of the Permit states, “The Permittee shall record the results of each inspection in an inspection report or checklist and keep the records on-site...The Permittee shall ensure each inspection report documents the observations, verifications and assessments required...”

Mr. Hardersen told us either he, or an employee, routinely performs housekeeping tasks outside, though they do not document their inspections.

X. Closing Conference

After completing the site tour, I held a brief closing conference with Mr. Hardersen. I discussed my observations and areas of concern with him. I then thanked him for his time and cooperation with the inspection.

ATTACHMENT A

Satellite Imagery

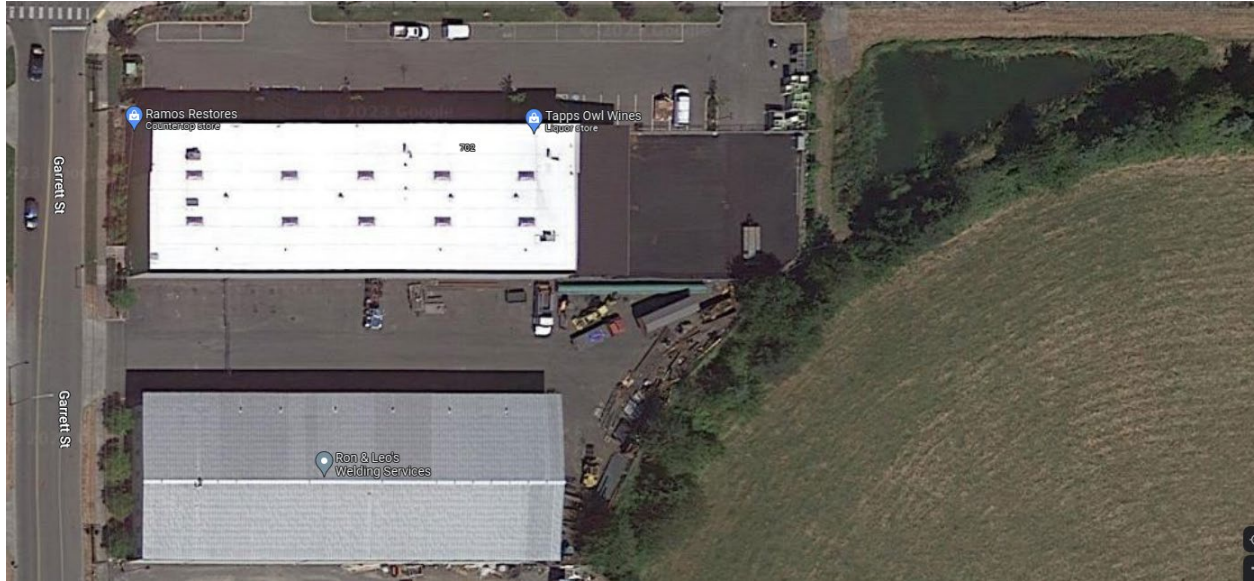


Figure 1: Ron and Leo's Welding Service shown in lower portion, with darker gray roof. Upper right shows municipal stormwater pond south of Battersby Avenue

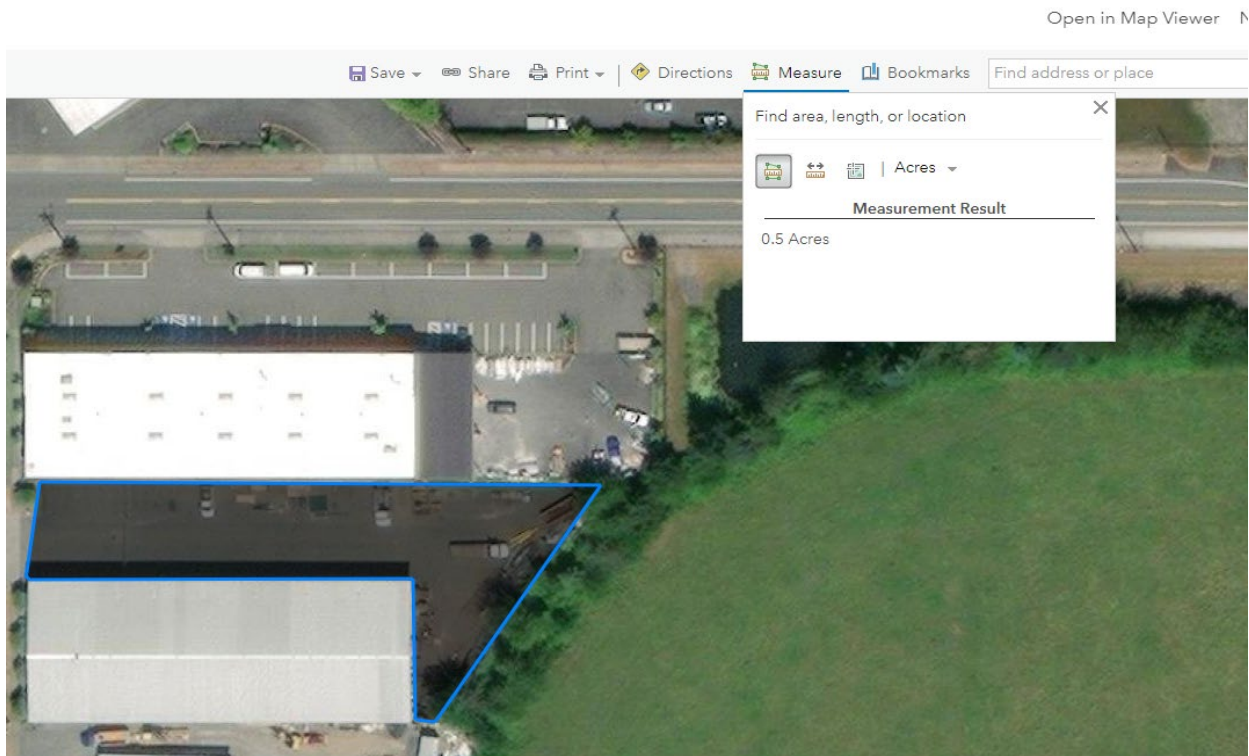


Figure 2: GIS imagery of the portion of the Ron and Leo's Welding Service Facility exposed to rainwater, approximately 0.5 acres.

ATTACHMENT B

City of Enumclaw Comprehensive Stormwater Plan Imagery

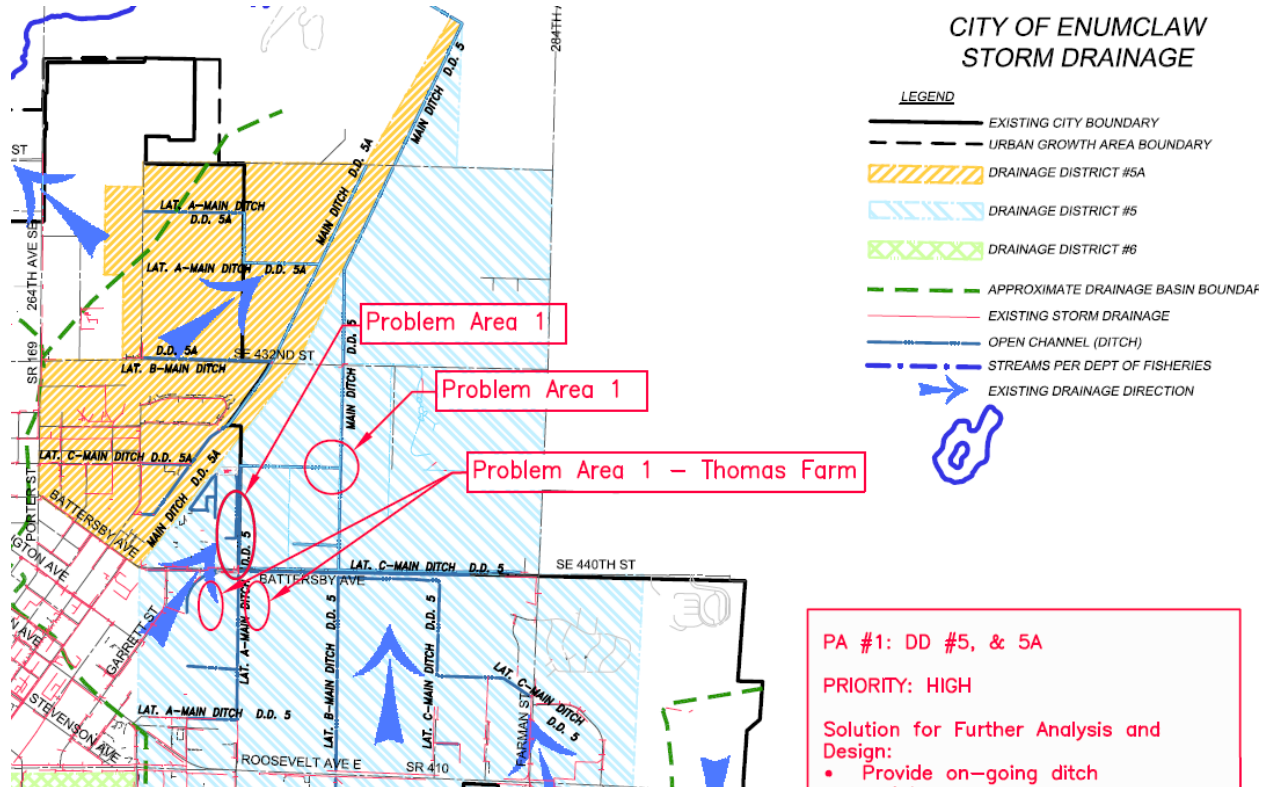


Figure 3: Image from pdf pg. 164 of city's Comprehensive Stormwater Plan. Stormwater from the Facility flows northeast, then north through Drainage District 5 and to the Newaukum Creek.

ATTACHMENT C

Photograph Log

All photographs taken by Kyle Masters on January 18, 2023²

Nikon Coolpix AW120

Photo Log – Ron and Leo’s Welding Services	
	
Photo #: 01 (DSCN0528) Description: Facing south, photo of stormwater pond south of Battersby Avenue, looking towards receiving inlet.	Photo #:02 (DSCN0529) Description: Facing east, photo of stormwater pond south of Battersby Avenue, showing outfall crossing the street into Drainage District 5 lateral.

2 Time stamp in all photos is one hour later than actual time.



Photo #: 03 (DSCN0530)
Description: Facing south, showing inlet of stormwater to the municipal stormwater pond south of Battersby Avenue.



Photo #: 04 (DSCN0531)
Description: Facing north, photo of drainage ditch receiving water from the pond south of Battersby Avenue.



Photo #: 05 (DSCN0532)
Description: Facing north, inside the Facility's fenceline, showing two approximately 15-gallon drums. Mr. Hardersen told us he found the drums abandoned at the Facility within the past month.



Photo #: 06 (DSC0533)
Description: Close-up of the open drum in Photo 5, showing an apparent oily/water mixture. Mr. Hardersen told us he thought both drums contained grease.



Photo #: 07 (DSCN0534)

Description: Facing east, photo of a drainage ditch with flow just outside the Facility's fenceline. The water appeared to flow north, towards Battersby Avenue.



Photo #: 08 (DSCN0535)

Description: Facing northeast, photo of the ditch outside the Facility's fenceline, flowing north to municipal stormwater pond south of Battersby Avenue.



Photo #: 09 (DSCN0536)

Description: Facing southeast, photo of stormwater and debris beneath open roll-off container holding scrap metal.



Photo #: 10 (DSC0536)

Description: Facing southeast, photo of the contents of the open roll-off container shown in Photo 9.



Photo #: 11 (DSCN0537)
Description: Facing southeast, open roll-off container in Photo 10, slightly zoomed in.



Photo #:12 (DSCN0538)
Description: Facing east, photo of a catch basin next to the open roll-off in previous photos.



Photo #: 13 (DSCN0539)
Description: Facing east, photo of catch basin in proximity to open roll-off.



Photo #: 14 (DSC0540)
Description: Facing southwest, overview photo of the outside of the Facility, largely used as storage with scrap metal in foreground.



Photo #: 15 (DSC0541)
 Description: Facing northwest, overview photo of the outside of the Facility, largely used as storage with a mixture of scrap metal and debris on the ground.



Photo #: 16 (DSC0542)
 Description: Facing east, a second catch basin with absorbent pads placed to the side. Stormwater flowing towards catch basin contained a sheen.



Photo #: 17 (DSC0543)
 Description: Facing east, exterior shelving holding a variety of both product oils and greases, and "waste oil," also approximately 12 compressed gas cylinders, some chained.



Photo #: 18 (DSC0544)
 Description: Facing south, exterior storage compartment housing a large compressor. Also, two 5-gallon buckets of oil, and three approximately 5-gallon fuel cans sitting outside and exposed.



Photo #: 19 (DSCN0545)

Description: Facing west, close-up of Photo 17 showing 5 approximately 55-gallon drums of oil. Mr. Hardersen characterized two of the drums as holding used oil. The drums all appeared wet on top.