



NPDES Compliance Inspection Report

AM Manufacturing

**NPDES Permit Tracking Number
WAU000669**

Inspection Date: 05/12/2023

Prepared by:

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

Inspector Signature/Date:

JONATHAN MASTERS	Digitally signed by JONATHAN MASTERS Date: 2023.07.12 07:59:02 -07'00'
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Supervisor Signature/Date:

Marshallonis, Daniel (Dino)	Digitally signed by Marshallonis, Daniel (Dino) Date: 2023.07.12 09:13:15 -07'00'
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-	Contents	
I.	<u>Facility Information</u>	3
II.	<u>Inspection Information</u>	3
III.	<u>Permit Information</u>	4
IV.	<u>Facility Background</u>	4
V.	<u>Inspection Chronology</u>	4
VI.	<u>Opening Conference</u>	5
VII.	<u>Site Review</u>	5
VIII.	<u>File Review</u>	6
IX.	<u>Areas of Concern</u>	6
A.	<u>Industrial Stormwater General Permit Coverage</u>	6
X.	<u>Closing Conference</u>	6

ATTACHMENT A – Sattellite Imagery

ATTACHMENT B – City of Enumclaw Comprehensive Stormwater Plan Imagery

ATTACHMENT C – Photograph Log

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

I. Facility Information

Facility Name:	AM Manufacturing, Inc
Facility Owner:	Mr. Alex Whitehouse Mr. Mason Drennen Ms. Melissa Harjo
Facility Address:	2283 Cole Street Enumclaw, Washington 98022
Mailing Address:	2283 Garrett Street Enumclaw, Washington 98022
Facility Contact(s):	Melissa Harjo, Co-Owner AM Manufacturing (360) 367-7097 Melissa@AMManufacturinginc.com
Latitude/Longitude:	N 47.20805 W -121.98467
NPDES Tracking Number:	WAU000669
NAICS Code(s):	332710
Facility Size:	Approximately 0.81 acres, approximately 0.4 acres potentially exposed

II. Inspection Information

Inspection Date:	May 12, 2023
Inspector(s):	Kyle Masters, Inspector EPA Region 10, ECAD / SWES Rose Propst, Inspector Washington Department of Ecology Darren Chromey, Source Control Inspector City of Enumclaw
Arrival Time:	11:30 AM

Departure Time:	11:55 AM
Weather:	Mostly Sunny
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.

III. Permit Information

AM Manufacturing (“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 WAU000669 after this inspection for tracking purposes.

Due to the full-service small parts manufacturing and machining services occurring on-site, the Facility likely 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.

Industrial facilities may apply for a conditional no exposure exemption (CNE) if no industrial activities or material handling occurs where rain, snow, snow melt, or runoff exposure is possible.

IV. Facility Background

AM Manufacturing began operations at this Facility approximately 3 years ago in 2020, according to Ms. Harjo. Prior to moving there, the company operated at another facility in the area.

Operations at the Facility consist of manufacturing of metal parts. Staff may manufacture, or modify existing, parts with machining tools like lathes, mills, CNC machines, and drills.

Business hours are Monday through Thursday, 5AM – 4PM. The Facility employees approximately six staff.

V. Inspection Chronology

This was an unannounced inspection. Upon arriving on-site, I, along with Ms. Propst and Mr. Chromey, introduced ourselves to Mr. Drennen. I explained I was conducting unannounced stormwater inspections in the area that day. He took us to the main office where we met Ms. Harjo, who served as our main contact during the inspection.

The inspection consisted of an opening conference, a walk-through of the Facility, the outside area around the Facility, and ended with a closing conference. Ms. Harjo accompanied us throughout the inspection

VI. Opening Conference

The opening conference was held shortly after our arrival in the main office. We introduced ourselves to Ms. Harjo and I presented my inspector credentials. I explained we were conducting inspections in the area. We then discussed the purpose and scope of the inspection.

During the opening conference Ms. Harjo provided a brief background on the Facility's history and operations. She confirmed the Facility does not have a stormwater permit with the Washington State Department of Ecology, and they do not sample stormwater discharges.

VII. Site Review

According to Ms. Harjo, the Facility consists of the main shop floor where staff use the lathe, presses, drills, and machining equipment to manufacture or modify parts to complete work for their customers.

We walked through the main production floor inside the Facility. Ms. Harjo pointed out where the different machines sat. She told us Facility staff were performing maintenance on some of the equipment in the shop. We saw an approximately 275-gallon intermediate bulk container ("tote") holding used oil from the machining equipment (**Photo 1**). Ms. Harjo told us it took about one year for the Facility to fill up a tote with used oil. At that point, they would coordinate a pick-up with their used oil vendor. We asked if the Facility kept a stocked spill kit, Ms. Harjo showed us their spill kit, which sat approximately 50 feet from the where staff performed the oil changes during our site tour.

We completed our walk through the Facility and went outside. We walked around the perimeter of the Facility. The entire area appeared paved. We did not see any product storage or other signs of industrial activity outside. We did see a municipal solid waste dumpster, which sat with its lid closed. Ms. Harjo told us they always keep the dumpster closed as a matter of practice.

Ms. Harjo confirmed the company owns the smaller building just to the east of the main Facility. She told us they currently leased the building to another company, who store materials inside. We did not see indications of industrial activity outside the building,

and Ms. Harjo said she was not aware of any activity occurring outside the building. We completed walking the perimeter. At the northern boundary we saw a catch basin collecting stormwater from the area, which appeared to convey to a neighboring retention pond (**Photo 2**). We did not see any potential pollutant sources relating to industrial activity during the inspection.

VIII. File Review

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

IX. Area 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

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

Based on our observations and conversation with Ms. Harjo, the Facility likely requires permit coverage. We confirmed the Facility performs industrial activities inline with the above NAICS groups, and stormwater leaves the Facility and discharges into a municipal separate storm sewer system and surface waterbodies.

X. Closing Conference

After completing the site tour, I held a brief closing conference with Ms. Harjo. I discussed my observations and area of concern with her. I then thanked Ms. Harjo for her time and cooperation with the inspection.

¹ The following table serves as an excerpt to the full Table 1, edited for clarity, found in the Permit.

ATTACHMENT A

Satellite Imagery



Figure 1: AM Manufacturing property shown in shaded portion, with drawn blue border.

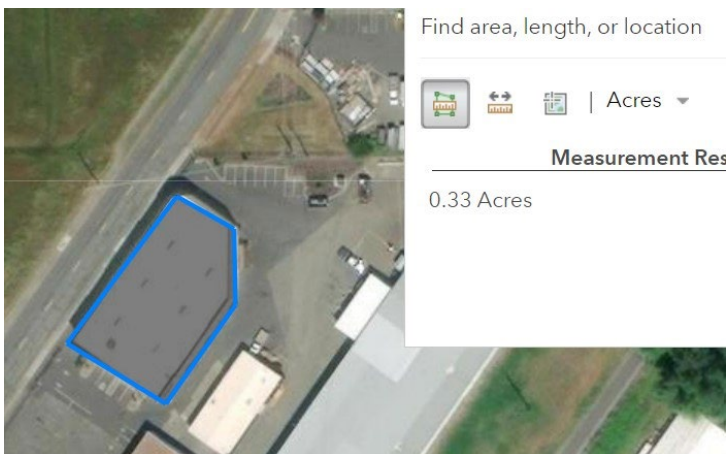


Figure 2: Main AM Manufacturing building, and site of manufacturing business.

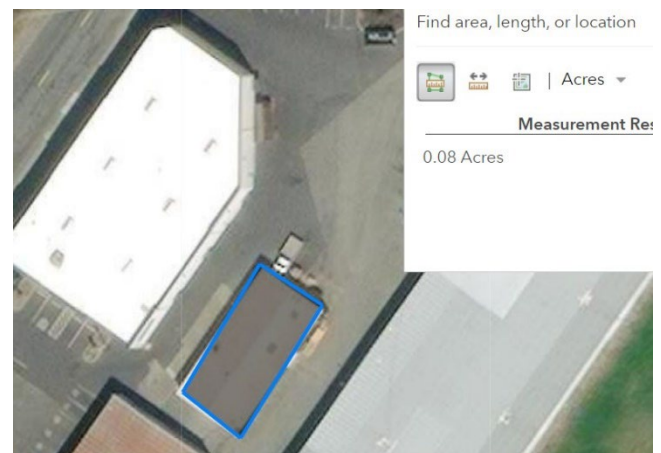


Figure 3: Ancillary building on property currently leased out.

ATTACHMENT B

City of Enumclaw Comprehensive Stormwater Plan Imagery

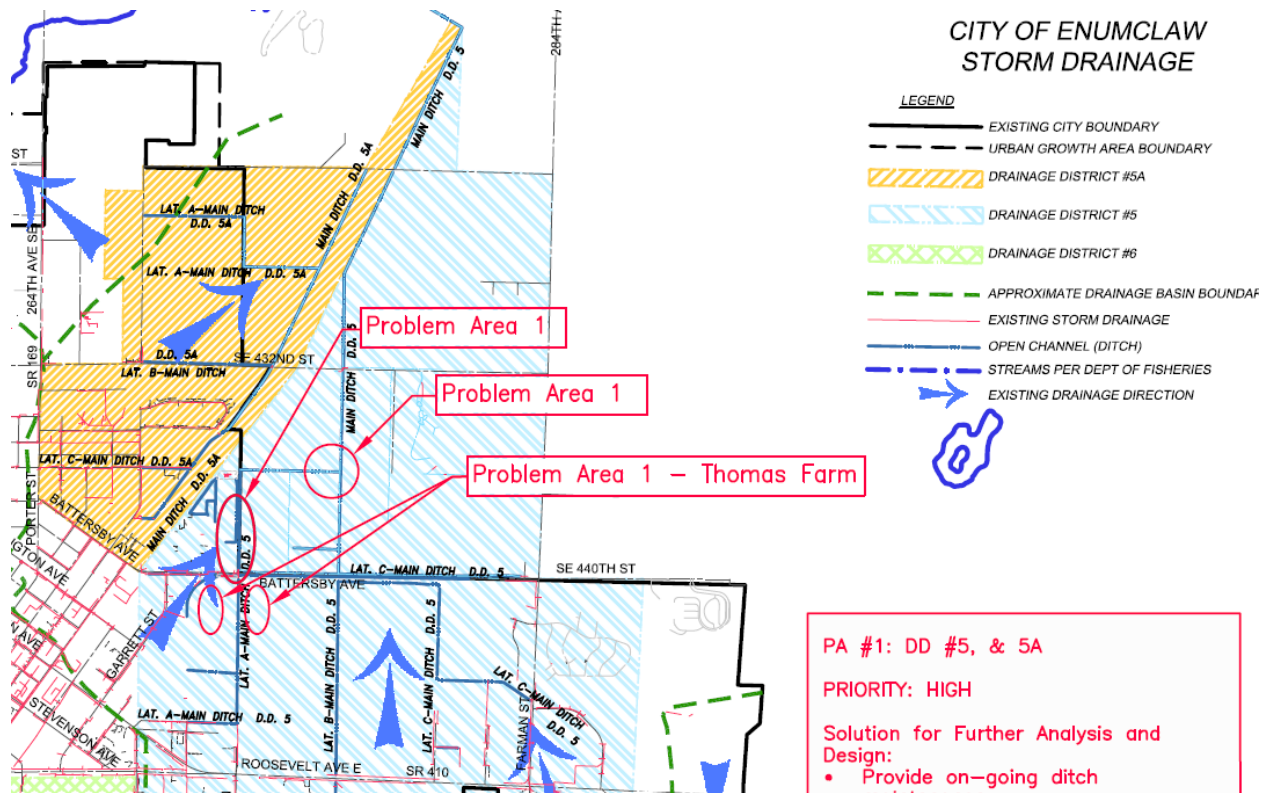


Figure 4: Image from pdf pg. 164 of city's Comprehensive Stormwater Plan. Stormwater from the Facility flows northeast, then north through Drainage District 5 and to the Newaukum Creek.

ATTACHMENT C

Photograph Log

All photographs taken by Kyle Masters on May 12, 2023

Nikon Coolpix AW120

Photo Log – AM Manufacturing



Photo #: 01 (DSCN0603)
Description: Approximately 275-gallon intermediate bulk container holding used oil.



Photo #: 02 (DSCN0604)
Description: Facing north, catch basin at perimeter of facility. Stormwater flows north into nearby retention basin.