

NPDES Inspection Report - Stormwater Industrial

National Database Information		
Inspection Date: 3/12/2024	Inspection Type: Industrial Stormwater	
Entry/Exit Time: 8:10 am / 9:45 am	NPDES ID Number: UTU000040	
SIC Code: 3499	Inspection ID: 202403_ UTU000040	
Lead Inspector and affiliation: Stephanie Meyers / EPA Region 8		
Inspector and affiliation: Althea Wilson / EPA Region 8		
Inspector and affiliation: Jordan Bryant / Utah Division of Water Quality		
Inspector and affiliation: Shaunna Mills / Salt Lake City MS4		
Site/Facility Name and Location: Doppelmayr USA, Inc. 3160 W 500 S Salt Lake City, UT 84104		
Permit Information		
Is the permit on site and available? Unpermitted facility	Date Application Submitted: Unpermitted facility	
Latitude: 40.75895°N	Longitude: -111.967501°W	
Receiving Water(s): Unnamed, unclassified ditch thence to the Salt Lake City Municipal Separate Storm Sewer System (MS4) thence to the Middle Branch Brighton	Acreage: approximately 25 acres	
Regulatory Inspector's source of information: Facility observations		
Areas Evaluated During Inspection		
Permit	Self-Monitoring Program	<u>Pollution Prevention</u>
Records	Compliance Schedule	<u>Stormwater</u>
<u>Facility Site Review</u>	Laboratory	<u>No Exposure</u>
<u>Effluent/Receiving Waters</u>	Operations and Maintenance	Other:
Flow Measurement	Sludge Handling/Disposal	Other:
Contact Information		
	Name(s)/Title	
Facility Contacts: Primary lead and present during inspections	Keith Johns / Vice President, Operations / Doppelmayr USA, Inc. / Primary lead during the inspection	
	Andrew Murdock / Tools, Facility, and Fleet Manager / Doppelmayr USA, Inc. / Present during the inspection	
Person/Company meeting definition of "Operator"	Doppelmayr USA, Inc.	
Authorized Official(s) (Per NOI or SWPPP)	N/A, since there is currently no permit for this facility	

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Report Review and Signature		
Drafter Name	Address/Phone Number	Date
Stephanie Meyers	U.S. EPA Region 8 1595 Wynkoop Street 8ECA-W-N Denver, Colorado 80202	3/22/2024
	303-312-6938	
Reviewer Name	Address/Phone Number	Date
Althea Wilson	U.S. EPA Region 8 1595 Wynkoop Street 8ECA-W-N Denver, Colorado 80202	3/26/2024
	303-312-6026	
Supervisor Signature/Name	Address/Phone Number	Date
 EMILIO LLAMOZAS Digitally signed by EMILIO LLAMOZAS Date: 2024.04.16 09:42:17 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ECA-W-N Denver, Colorado 80202	4/11/2024
	Emilio Llamozas	

Inspection Narrative and Site Description
On March 12, 2024, U.S. Environmental Protection Agency (EPA) inspectors Stephanie Meyers and Althea Wilson along with Utah Division of Water Quality (DWQ) inspector Jordan Bryant, and Salt Lake City Municipal Separate Storm Sewer System (MS4) Water Quality Coordinator Shaunna Mills arrived at Doppelmayr USA, Inc. (facility) at 8:10 am to conduct an inspection and evaluate the facility's need for industrial stormwater permit coverage. The EPA, DWQ, and MS4 performed a joint inspection at this facility. The inspection was announced approximately one week prior to the inspection, to coordinate logistics for the inspection and to ensure that appropriate personnel would be available. The EPA inspectors along with DWQ and the MS4 met with Keith Johns, Vice President of Operations and Andrew Murdock, Tools, Facility, and Fleet Manager, of Doppelmayr USA, Inc. EPA inspector, Stephanie Meyers, presented her credentials and had an opening conference to explain the purpose of the inspection. The inspectors began by going through a series of checklist questions with the facility representatives. Once complete, the inspectors proceeded to inspect the facility and asked questions to the facility representative to help the inspectors evaluate the need for industrial stormwater permit coverage. Throughout the inspection, the inspectors noted their observations in a checklist. Photographs taken during the inspection are included in the attached photo log. Doppelmayr USA, Inc. is located at 3160 W 500 S in Salt Lake City, Utah. Doppelmayr USA, Inc. is a global company that was established in 1893. The company employs over 3,000 individuals in 50

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Inspection Narrative and Site Description

countries around the world. Doppelmayr USA, Inc. plans, develops, designs, manufactures, builds, and supports projects including high-performance ropeways for passenger and material transport, particularly ski lifts. The facility located in Salt Lake City was established in 2002. The facility provides steel fabrication services for ski lift towers. Facility representatives stated that raw steel is brought into the facility and is fabricated and welded together for ski lift towers, frames, walkway brackets, and cross arms. Drilling, cutting, machining, and sand blasting also occur on site. Other parts and materials are purchased and brought on site for assembly, such as haul rope, hydraulics, control panels, and operator houses. Final products are stored outdoors prior to being manufactured.

After the opening conference, inspectors then walked the facility and first observed the final product of a finished ski lift tower (photo 18), which is the primary product that is fabricated on site. The steel fabrication activities such as welding, drilling, and cutting mainly occur indoors in the building in the background of photo 18. Inspectors then proceeded to continue to walk the site and observed the final product laydown yard, where there is a stormwater channel flowing in the center of the facility that flows from north to south (photo 19). Inspectors then observed the area where steel structures are stored prior to being sent out elsewhere for galvanization (photo 20). The same stormwater channel flows along this area. Scrap steel is collected in scrap metal waste bins on site (photo 21). A sump is located at the southern end of the central stormwater channel, which pumps stormwater north through the channel to avoid flooding on the south end (photo 22). The central stormwater channel flows into a storm drain (photo 25) and then into a Salt Lake City MS4 storm drain (photo 24). Sand blasting activities occur under cover outdoors (photo 1.1 – Note facility representatives prohibited inspectors from taking photos of this area, thus the use of aerial imagery). A 500-gallon diesel fuel tank used for fueling equipment and machinery on site is located near the sand blast area. A second stormwater channel runs along the west end of the property and flows from north to south, draining into a retention pond (photo 23).

After the inspection of the facility, the inspectors returned to the main office and held a closing conference with Keith Johns and Andrew Murdock where they discussed observations.

Observations, Corrective Actions, and Recommendations

Observation 1: Doppelmayr USA, Inc. is an industrial facility under industrial stormwater Sector AA: Fabricated Metal Products Manufacturing Facilities, operating without industrial stormwater permit coverage.

The facility's primary SIC code is 3499 (Fabricated Metal Products, Not Elsewhere Classified), which falls under industrial stormwater Sector AA: Fabricated Metal Products Manufacturing Facilities, requiring industrial stormwater permit coverage. The facility has outdoor industrial operations/activities (photo 1.1) as well as outdoor storage of materials (photos 19-22). The inspectors observed several stormwater drainage pathways at the facility during the inspection, including:

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Observations, Corrective Actions, and Recommendations

1. A channel conveying stormwater runoff that flows from north to south in the center of the facility, which drains to a Salt Lake City MS4 storm drain thence to the Middle Branch Brighton (photos 19, 20, 24, and 25).
2. A second channel conveying stormwater runoff along the west end of the facility, which connects to a retention pond (photo 23). If the retention pond overflowed during storm events, it would drain to a second Salt Lake City MS4 storm drain thence to the Middle Branch Brighton.

Regulatory Information:

In 1987, the US Congress amended the Clean Water Act to expressly include stormwater discharges from industrial activities as requiring Clean Water Act controls. In 1990, EPA issued regulations that require specific industrial activities to obtain permits in order to discharge stormwater from their facilities under 40 C.F.R. 122.26. The Division of Water Quality of the Utah Department of Environmental Quality has direction and authority to administer stormwater permitting in Utah through the Utah Water Quality Act, and its implementing regulations and permits.

In accordance with the Utah Water Quality Act, Title 19, Chapter 5, Utah Code Annotated 2004 and the Utah Pollutant Discharge Elimination System (UPDES) Regulations, UPDES discharge permit coverage is required for stormwater discharges from specific industrial activities to surface waters of the State. Facilities engaged in fabricated metal products manufacturing (Standard Industrial Classification (SIC) codes 3411-3499 and 3911-3915) as the primary industrial activity, are specifically required to obtain permit coverage, or a No-Exposure Certification, or a No-Discharge Certification, for discharges of stormwater associated with industrial activities from the facility to surface waters of the State.

A No-Exposure Certification may be obtained for facilities where all industrial materials and activities are protected by a storm-resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. A No-Discharge Certification may be obtained for facilities with a SIC code that requires coverage but do not discharge to surface water or groundwater. Due to the outdoor storage of materials, industrial activities being conducted outdoors, and hydrologic connection to the Salt Lake City MS4, Doppelmayer USA, Inc. does not currently qualify for the No-Exposure or No-Discharge Certifications.

Corrective Action:

Within 30 days of receipt of this report, submit a Notice of Intent (NOI) for the UPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (UTR000000). See the attached NOI Form. For assistance with the NOI or if you have any questions, please contact Jordan Bryant with DWQ at jtbyrant@utah.gov.

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Observations, Corrective Actions, and Recommendations

Observation 2: Sand blasting activities being conducted outdoors resulted in sand blast material scattered around the area (aerial photo 1.1).

Inspectors observed sand blasting occurs along the west end of the property along a concrete conveyance that leads to the stormwater channel in the center of the property. Sand blast material was observed scattered around the area and within the concrete conveyance.

Recommendation: Ensure sand blasting material is contained and implement a routine sweeping schedule to clean up any material left on the ground.

Observation 3: There is no spill kit located near the fueling tank.

Inspectors observed the 500-gallon diesel fuel tank located along the west end of the facility did not have a spill kit nearby.

Recommendation: Place a spill kit containing absorbent materials near the fueling tank. If a spill were to occur, the spill kit should be easily accessible for immediate cleanup.