

NPDES Inspection Report - Stormwater Industrial

National Database Information		
Inspection Date: 3/12/2024	Inspection Type: Industrial Stormwater	
Entry/Exit Time: 10:30 am / 11:20 am	NPDES ID Number: UTU000037	
SIC Code: 3441	Inspection ID: 202403_ UTU000037	
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: 3D Steel Corporation 841 Chestnut Street Salt Lake City, UT 84104		
Permit Information		
Is the permit on site and available? Unpermitted facility	Date Application Submitted: Unpermitted facility	
Latitude: 40.750469°N	Longitude: -111.954889°W	
Receiving Water(s): Surplus Canal thence to the Great Salt Lake	Acreage: approximately 3.2 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	Mark Dazley / Owner/ 3D Steel Corporation / Primary lead during the inspection	
Person/Company meeting definition of "Operator"	3D Steel Corporation	
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
ALTHEA WILSON Digitally signed by ALTHEA WILSON Date: 2024.04.24 10:12:31 -06'00' Althea Wilson	U.S. EPA Region 8 1595 Wynkoop Street 8ECA-W-N Denver, Colorado 80202	3/27/2024
	303-312-6026	
Reviewer Name	Address/Phone Number	Date
Stephanie Meyers	U.S. EPA Region 8 1595 Wynkoop Street 8ECA-W-N Denver, Colorado 80202	3/27/2024
	303-312-6938	
Supervisor Signature/Name	Address/Phone Number	Date
EMILIO LLAMOZAS Digitally signed by EMILIO LLAMOZAS Date: 2024.04.23 07:48:01 -06'00' Emilio Llamozas	U.S. EPA Region 8 1595 Wynkoop Street 8ECA-W-N Denver, Colorado 80202	4/15/2024
	303-312-6407	

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 3D Steel Corporation (facility) at 10:30 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 Mark Dazley, Owner of 3D Steel Corporation. 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. 3D Steel Corporation is located at 841 Chestnut Street in Salt Lake City, Utah. 3D Steel Corporation is a commercial fabricating business specializing in structural steel fabrication and has been serving the intermountain area since 2000. This facility has been at its current location since 2006. 3D Steel Corporation specializes in cutting, drilling, welding, and fabricating structural steel. The facility

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Inspection Narrative and Site Description

provides steel fabrication services for structural components for buildings. A facility representative stated that raw steel is brought into the facility and stored outdoors until it is fabricated and welded inside. Drilling, cutting, machining, and welding occur indoors. The facility uses a CNC plasma table for cutting steel, which produces a slag-like waste that is captured underneath the table. A facility representative stated that sand blasting does not occur on-site. The facility uses forklifts to transport material throughout the site, and five-gallon diesel cans for fueling the forklifts are stored outdoors in a covered bin. A facility representative stated that welding gasses are also stored outdoors. Final products are stored outdoors in the laydown/shipping/receiving lot to be trucked out to consumers.

After the opening conference, inspectors then walked the facility and first observed the northwest lot with raw and finished material stored outside (photo 26). The steel fabrication activities such as welding, drilling, and cutting mainly occur indoors in the building in the background of photo 28. Inspectors then proceeded to continue to walk the site and observed the second raw and final product laydown yard on the south side of the facility (photo 27). The welding gasses and fueling cans are stored in the right background of photo 28. Inspectors then observed the northwest corner of the facility building where dumpsters for scrap steel and trash as well as subsurface piping from the roof for stormwater draining are located (photo 28). The facility representative then showed inspectors the retention pond located on the west side of the facility (photo 29).

After the inspection of the facility, the inspectors returned to the main office and held a closing conference with Mark Dazley where they discussed observations.

Observations, Corrective Actions, and Recommendations

Observation 1: 3D Steel Corporation 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 3441 (Fabricated Structural Metal), which falls under industrial stormwater Sector AA: Fabricated Metal Products Manufacturing Facilities, requiring industrial stormwater permit coverage. The facility has outdoor storage of materials such as raw and finished products, gasoline storage, and scrap metal storage (photos 26-28). The inspectors observed stormwater flowing to the surface from a subsurface pipe (photo 28), and the Surplus Canal is within approximately 115 feet east of the facility and eventually flows to the Great Salt Lake.

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.

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Observations, Corrective Actions, and Recommendations

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 and proximity to surface waters, 3D Steel Corporation 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.

Observation 2: Open and empty drums that previously contained slag are stored outside.

Empty drums were observed throughout the outdoor portion of the site, which a facility representative stated previously contained slag material (right side of photo 27).

Recommendation: Dispose of the empty drums that are stored outdoors or bring empty drums inside under cover until they can be properly disposed of.

Observation 3: Used gas cans are stored outdoors.

Inspectors observed empty five-gallon diesel cans stored outdoors in an uncovered area in the northwest corner of the facility building (to the right of photo 28).

Recommendation: Dispose of the empty cans that are kept outdoors or bring empty cans inside under cover until they can be properly disposed of.

Observation 4: Scrap bins are uncovered and contain holes in the bottom.

Inspectors observed a scrap metal bin in the northwest corner of the facility building (photo 28) that is uncovered and contains holes in the bottom.

Recommendation: Cover the dumpster containing scrap steel and ensure any holes in the bottom are repaired to prevent leaking.