EPA United States Environmental Protection Agency

EPA REGION 10 Enforcement and Compliance Assurance Division

INSPECTION REPORT

Inspection Entry Date/Time	03/25/2024 11:30 AM (PT)	Announced: Yes
Inspection Exit Date/Time	03/25/2024 02:40 PM (PT)	Access: Granted
Weather	40°F, Overcast	
Media	Water	
Statute(s)/Program(s)	Clean Water Act, NPDES, Stormwater – Industrial	
Type of Inspection	Compliance Evaluation Inspection	
Permittee Name	Pacific Steel Group, Inc.	
Site Name	Pacific Steel Group - Tacoma	
Facility/Site Physical Address	401 E Alexander Avenue, Suite 407	
City, State, Zip Code	Tacoma, Washington 98421	
County/Borough/Parish	Pierce	
Facility GPS Coordinates	47.279764, -122.410548	
FRS ID	WAT5886523624	
Permit Number	WAR309612	
SIC	3449 (Miscellaneous Metal Work)	
NAICS	332312 (Fabricated Structural Metal Manufacturing)	

Lead Inspector:

RAYMOND ANDREWS Digitally signed by RAYMOND ANDREWS Date: 2024.05.14 14:34:20 -07'00'

Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252

Supervisor Review:

PETER CONTRERAS Digitally signed by PETER CONTRERAS Date: 2024.05.14 14:38:17 -07'00'

Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – Opening Conference

I arrived at the Pacific Steel Group - Tacoma (the "Site" or "Facility"), located at 401 E Alexander Avenue, Tacoma, Washington at 11:30 AM (PT) on 03/25/2024 for an announced inspection. I was accompanied by Nicolas Haddad, an Inspector in Training, who was there to observe inspection procedures. I presented credentials to Eric Benson, CEO, and David Perkins, Executive Vice President & General Counsel. I informed them I was there to conduct an inspection to determine compliance with the Clean Water Act (CWA) and the facility's Washington Department of Ecology's (WDOE) Industrial Stormwater General Permit (ISGP), permit # WAR309612. This report is based on information supplied by Mr. Benson and Mr. Perkins, direct observations made by me, and records and reports maintained by the facility. In addition, information gathered prior to, or after, the inspection from a review of EPA, State, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Raymond Andrews	Lead Inspector	Yes	Yes
EPA Region 10	Nicolas Haddad	Inspector	Yes	Yes
Pacific Steel Group	David Perkins	Executive VP General Counsel	Yes	Yes
Pacific Steel Group	Eric Benson	CEO	Yes	Yes

Facility Information

Responsible Official?	David Perkins, Executive Vice President, d.perkins@pacificsteelgroup.com
How long has the facility been in operation?	Pacific Steel Group began operations on the site on June 3, 2019
What is the total area of the facility site?	The facility's site covers approximately 2.25 acres.
Is the site owned or leased?	The site is leased from the Port of Tacoma
What is the facility's receiving water?	The facility's receiving water is Blair Waterway which is an offshoot of Commencement Bay.
What percentage of the site is impervious ground?	The entire site is covered by buildings or asphalt. All industrial activities are performed in buildings or under cover.
How many employees does the facility have and what are its hours of operation?	The facility has 15 full time employees and operates from 4:00am until 2:00pm, Monday through Friday. The facility is closed on weekends and holidays.

What is the facility's primary activities?	The facility conducts loading and unloading operations of dry bulk materials onto and off flatbed trailers. PSG Tacoma processes approximately 400 tons of rebar monthly. The rebar is bent and ground to different shapes per customer specifications or to meet the needs of the retail market. The processing of the rebar occurs in enclosed buildings or covered areas. Some of the equipment used in the process includes heaters, chillers, coilers, threaders, table benders, and shear lines.
Does the facility conduct, and document, routine inspections required by the permit?	Eric Garth and Ron Ackles are the employees responsible for conducting and documenting the routine monthly visual inspections at the site.
How many inlets, outfalls, and/or drains does the facility have?	The facility has two catch basins on site. One is located near the north end of the warehouse, and the other is in a laydown yard. Both catch basins flow to a single outfall.
Does the facility analyze water samples in-house?	All water sampling and analysis are contracted out.
How often does the facility conduct sampling?	Sampling is conducted monthly by: Catchall Environmental 3221 Center St Tacoma, Washington 98409 (253) 572-0989
What is the contract lab's contact information?	Water sample analysis is conducted by: Friedman & Bruya, Inc. Environmental Chemists 5500 4th Avenue South Seattle, Washington 98108 (206) 285-8282

SECTION II – Observations

No observations were made that constitute an Area of Concern.

SECTION III – Records Review

Records may not be in sequential order.

Record: Other - EPA's Integrated Compliance Information System (ICIS) Database	**AOC:** Yes
Ref #: RA1-RR-006	**Reviewed Date:** 03/19/2024
Pre-inspection I reviewed EPA's ICIS database for the period from March 2019 through February 2024. I found the facility failed to submit its 2021 Annual Report. I also found the facility failed to submit complete Discharge Monitoring Reports by the due date on five occasions. A table of the late DMRs is in Appendix 3.	

Record: Laboratory Analysis Reports — **AOC:** No

Ref #: RA1-RR-005 **Reviewed By:** Raymond Andrews **Reviewed Date:** 05/13/2024

Post Inspection, I reviewed laboratory analysis and chain of custody documents from January 2020 through December 2023.

I did not note any Areas of Concern.

Record: Annual Reports — **AOC:** Yes

Ref #: RA1-RR-004 **Reviewed By:** Raymond Andrews **Reviewed Date:** 05/13/2024

Post inspection, I reviewed the facility's Annual Reports covering 2020, 2021, and 2022.

The Annual Reports for 2020 and 2021 both have a signature date of March 23, 2024.

The Annual Report for 2022 had an error. The report was signed by Mr. Anthony Encinias on May 16, 2023. Due to continued exceedances of some pollutant parameters, the facility was required to initiate Level 2 Corrective Actions. The error is the report gives a Level 2 Corrective Action completion date of November 23, 2011.

Record: Other - Routine Facility Inspection Reports — **AOC:** Yes

Ref #: RA1-RR-003 **Reviewed By:** Raymond Andrews **Reviewed Date:** 05/13/2024

Post inspection I reviewed routine facility inspection reports covering December 2020 through February 2024.

The inspection reports appear to be complete; however, I noted many of the inspection reports had not been certified, as required, by a "Duly Authorized" individual. An example of an unsigned facility inspection report is included in Appendix 2 of this report.

Record: Other - SWPPP Map — **AOC:** Yes

Ref #: RA1-RR-002 **Reviewed By:** Raymond Andrews **Reviewed Date:** 03/25/2024

At the time of the inspection, I reviewed the facility site map in the Stormwater Pollution Prevention Plan (SWPPP).

The map had a revision date of December 13, 2023. The map was missing the following required elements:

- the size of the property in acres;
- locations of all structural source control BMPs;
- locations of all stormwater conveyances; and
- locations and sources of run-on from adjacent properties that may contain pollutants.

Record: SWPPP — **AOC:** No

Ref #: RA1-RR-001 **Reviewed By:** Raymond Andrews **Reviewed Date:** 03/25/2024

At the time of inspection, I reviewed the facility's Stormwater Pollution Prevention Plan (SWPPP), dated December 2023.

The SWPPP appeared to contain all required information except for certain elements missing from the SWPPP map. The map is addressed fully in another section of this report.

SECTION IV – Sampling Activities
No sampling was conducted.

SECTION V – Areas of Concern

Areas of Concern may not be in sequential order.

The presentation of Areas of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: RA1-RR-003	Records Review: Other - Routine Facility Inspection Reports
Permit Requirement G2.A of the permit states, "All permit applications shall be signed: 1. In the case of corporations, by a responsible corporate officer. 2. In the case of a partnership, by a general partner of a partnership. 3. In the case of sole proprietorship, by the proprietor. 4. In the case of a municipal, state, or other public facility, by either a principal executive 5. officer or ranking elected official." G2.B of the permit states, in part, "All reports required by this permit and other information requested by Ecology shall be signed by a person described above or by a duly authorized representative of that person..."	
AOC: I noted many of the inspection reports had not been certified, as required, by a "Duly Authorized" individual. An example of an unsigned facility inspection report is included in this report.	
AOC Reference #: RA1-RR-002	**Records Review: Other - SWPPP Map**
Permit Requirement 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. The Permittee shall identify any parts of the SWPPP which the facility wants to claim as confidential business information. 1. The site map shall identify (site map may be multiple pages if needed): b. The size of the property in acres. e. Locations of all structural source control BMPs. i. Locations of all stormwater conveyances including ditches, pipes, catch basins, vaults, ponds, swales, etc. p. Locations and sources of run-on to your site from adjacent properties that may contain pollutants."	
AOC: The facility's SWPPP site map was missing the following required elements: • the size of the property in acres; • locations of all structural source control BMPs; • locations of all stormwater conveyances; and • locations and sources of run-on from adjacent properties that may contain pollutants.	

AOC Reference #: RA1-RR-004	Records Review: Annual Reports
Permit Requirement S9.C of the permit states, in part, "Permittees shall include the following information with each annual report. The Permittee shall...d. Describe the status of any Level 2 or 3 corrective actions triggered during the previous calendar year, and identify the date it expects to complete corrective actions."	
AOC: The Annual Report for 2022 had an error. The report was signed by Mr. Anthony Encinias on May 16, 2023. Due to continued exceedances of some pollutant parameters, the facility was required to initiate Level 2 Corrective Actions. The error is report gives a Level 2 Corrective Action completion date of November 23, 2011.	
AOC Reference #: RA1-RR-006	**Records Review: Other - EPA's Integrated Compliance Information System (ICIS) Database**
Permit Requirement S9.C.1 of the permit states, in part, "The Permittee shall submit a complete and accurate Annual Report to the Department of Ecology no later than May 15th of each year..."	
AOC: I found the facility failed to submit its 2021 Annual Report.	
AOC Reference #: RA1-RR-006	**Records Review: Other - EPA's Integrated Compliance Information System (ICIS) Database**
Permit Requirement Part S9.B of the permit states, "The Permittee shall submit sampling data obtained during each reporting period on a Discharge Monitoring Report (DMR) or a Solids Monitoring Form (SMR)8 form provided, or otherwise approved, by Ecology."	
AOC: I found the facility failed to submit complete Discharge Monitoring Reports by the due date on five occasions. A table of the late DMRs is in Attachment B.	

SECTION VI – Closing Conference

I held a closing conference with facility personnel at 2:45 PM (PT) on 03/25/2024. During the closing conference, I discussed the observations and Areas of Concern identified during the inspection. I told the facility representatives the Areas of Concern have not yet been evaluated for a formal compliance determination.

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Document Log
3. Discharge Monitoring Report Table

APPENDIX 1: Photo Log

All photos were taken by Lead EPA Inspector, Ray Andrews, during the inspection.

Photos were not manipulated beyond minor cropping for sizing and labels or callouts to draw attention to the subject of the photo.

All photos were taken with a government issued iPad through the SmartTools website and inserted directly into the photo log.

Catch basis 1 with bio-char insert, photo 1			IMG-20240325122654265416898.jpg
03/25/2024 12:26 PM (PT)	No CBI	No PII	Photographer: Raymond Andrews

Catch basis 1 with bio-char insert, photo 2			IMG-20240325122736273616291 3.jpg
03/25/2024 12:27 PM (PT)	No CBI	No PII	Photographer: Raymond Andrews

Sampling Point 1 (SP1) in relation to covered work area			IMG-202403251231163116148815.jpg
03/25/2024 12:31 PM (PT)	No CBI	No PII	Photographer: Raymond Andrews

Sampling Point 1 (SP1), close up			IMG-202403251231263126171754.jpg
03/25/2024 12:31 PM (PT)	No CBI	No PII	Photographer: Raymond Andrews

Sampling Point 1 (SP1), open, showing bio-char			IMG-202403251232373237163896.jpg
03/25/2024 12:32 PM (PT)	No CBI	No PII	Photographer: Raymond Andrews

Rebar stored outside in yard			IMG-202403251235483548116926.jpg
03/25/2024 12:35 PM (PT)	No CBI	No PII	Photographer: Raymond Andrews

1 of 4 catch basins in public thoroughfare maintained by port, photo 1			IMG-202403251237193719141966.jpg
03/25/2024 12:37 PM (PT)	No CBI	No PII	Photographer: Raymond Andrews

1 of 4 catch basins in public thoroughfare maintained by port, photo 2			IMG-202403251237393739137754.jpg
03/25/2024 12:37 PM (PT)	No CBI	No PII	Photographer: Raymond Andrews

Outfall			IMG-20240325124239423916634O.jpg
03/25/2024 12:42 PM (PT)	No CBI	No PII	Photographer: Raymond Andrews

APPENDIX 2: Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Other - Routine Facility Inspection Report	PSG_October 2021.pdf	No	No	Raymond Andrews	05/13/2024
Annual Reports	2021 Annual Report - PSGT ISGP.pdf	No	No	Raymond Andrews	05/13/2024
Annual Reports	2022 Annual Report - PSGT ISGP.pdf	No	No	Raymond Andrews	05/13/2024

Industrial Stormwater Monthly Inspection Report

Inspections must be conducted by a person with the knowledge and skills to assess conditions and activities that could impact stormwater quality at the facility, and evaluate the effectiveness of best management practices required by this permit. Retain a copy of the completed and signed form in accordance with Permit Condition S9.C.

FACILITY NAME: PSG - Tacoma	**INSPECTION TIME:** 1300 **DATE:** 10/29/21

WEATHER INFORMATION:

- Description of Weather Conditions (e.g., sunny, cloudy, raining, snowing, etc.): Overcast, 50's
- Was stormwater (e.g., runoff from rain or snowmelt) flowing at outfalls and/or discharge areas shown on the Site Map during the inspection: ☐ Yes ☒ No ☐ **Comments:** Outfall unable to be observed due to access (locked gate), not raining

I. POTENTIAL POLLUTANT SOURCE AREA INSPECTION AND BEST MANAGEMENT PRACTICES EVALUATION

SWPPP and Site Map: Have a copy of the SWPPP and site map with you during the inspection so that you can ensure they are current and accurate. Use it as an aide in recording the location of any issues you identify during the inspection.	Yes	No	**Findings and Remedial Action Documentation:** Describe any findings below and the schedule for remedial action completion including the date initiated and date completed or expected to be completed.
• Is the Site Map current and accurate?	X		
• Is the SWPPP inventory of activities, materials and products current?	X		
Any new potential pollutant sources must be added to the map and reflected in the *SWPPP Facility Assessment & Tables 2, 2A, 3 and 5.*		X	

Vehicle/Equipment Areas:	Yes	No	NA	**Findings and Remedial Action Documentation:**
Equipment cleaning: Check NA if not performed on-site. Skip section.				
Is equipment washed and/or cleaned only in designated areas?			X	
• Observe washing: Is all wash water captured and properly disposed of?			X	
Equipment fueling: Check NA if not performed on-site. Skip section.				
• Are all fueling areas free of contaminant buildup and evidence of chronic leaks/spills?	X			
• Are all chemical liquids, fluids, and petroleum products, on an impervious surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed tank volume or 110% of the volume contained in the largest tank, whichever is greater?			X	
• Are structures in place to prevent precipitation from accumulating in containment areas?			X	
○ If not, is there any water or other fluids accumulated within the containment area?			X	
○ Note: If containment areas are not covered to prevent water from accumulating, the SWPPP must include a plan describing how accumulated water will be managed and disposed of.				

Equipment maintenance:	Yes	No	NA	Findings and Remedial Action Documentation:
• Are maintenance tools, equipment and materials stored under shelter, elevated and covered?	X			
• Are all drums and containers of fluids stored with proper cover and containment?	X			
• Are exteriors of containers kept outside free of deposits?	X			
• Are any vehicles and/or equipment leaking fluids? Identify leaking equipment.		X		
• Is there evidence of leaks or spills since last inspection? Identify and address.		X		
• Are materials, equipment, and activities located so that leaks are contained in existing containment and diversion systems (confine the storage of leaky or leak-prone vehicles and equipment awaiting maintenance to protected areas)?			X	
Add any additional site-specific BMPs:				
___				
___				
___				
___				

I. POTENTIAL POLLUTANT SOURCE AREA INSPECTION AND BEST MANAGEMENT PRACTICES EVALUATION

Good Housekeeping BMPs:	Yes	No	NA	Findings and Remedial Action Documentation:
1. Are paved surfaces free of accumulated dust/sediment and debris?				
• Date of last quarterly vacuum/sweep Sweeping conducted monthly		X		* Recommend sweeping to remove accumulated debris
• Are there areas of erosion or sediment/dust sources that discharge to storm drains?		X		
2. Are all waste receptacles located outdoors:				
• In good condition?	X			
• Not leaking contaminants?	X			
• Closed when is not being accessed?	X			
• External surfaces and area free of excessive contaminant buildup?	X			
3. Are the following areas free of accumulated dust/sediment, debris, contaminants, and/or spills/leaks of fluids?				
• External dock areas	X			
• Pallet, bin, and drum storage areas	X			
• Maintenance shop(s)	X			
• Equipment staging areas (loaders, tractors, trailers, forklifts, etc)	X			
• Around bag-house(s)			X	
• Around bone yards			X	
• Other areas of industrial activity:				

Spill Response and Equipment:	Yes	No	NA	Findings and Remedial Action Documentation:
Are spill kits available, in the following locations?				
• Fueling stations	X			
• Transfer and mobile fueling units			X	
• Vehicle and equipment maintenance areas	X			
Do the spill kits contain all the permit required items?				
• Oil absorbents capable of absorbing 15 gallons of fuel.	X			
• A storm drain plug or cover kit.	X			
• A non-water containment boom, a minimum of 10 feet in length with a 12 gallon absorbent capacity.	X			
• A non-metallic shovel.	X			
• Two five-gallon buckets with lids.	X			
Are contaminated absorbent materials properly disposed of?			X	

I. POTENTIAL POLLUTANT SOURCE AREA INSPECTION AND BEST MANAGEMENT PRACTICES EVALUATION

General Material Storage Areas:	Yes	No	NA	Findings and Remedial Action Documentation:
• Are damaged materials stored inside a building or another type of storm resistance shelter?			X	
• Are all uncontained material piles stored in a manner that does not allow discharge of impacted stormwater?	X			
• Are scrap metal bins covered?	X			
• Are outdoor containers covered?	X			

Stormwater BMPs and Treatment Structures: Visually inspect all stormwater BMPs and treatment structures devices, discharge areas infiltration and outfalls shown on the Site Map.	Yes	No	NA	Findings and Remedial Action Documentation:
• Are BMPs and treatment structures in good repair and operational?	X			
• Are BMPs and treatment structures free from debris buildup that may impair function?	X			
• The permit requires Permittees to clean catch basins when the depth of debris reaches 60% of the sump depth. In addition, the Permittee must keep the debris surface at least 6 inches below the outlet pipe. Based on this, do catch basins need to be cleaned?		X		
• Are berms, curbing or other methods used to divert and direct discharges adequate and in good condition?	X			

Observation of Stormwater Discharges:	Yes	No	NA	Findings and Remedial Action Documentation:
• Is the discharge free of floating materials, visible oil sheen, discoloration, turbidity, odor, foam or any other signs of contamination?			X	
• Water from washing vehicles or equipment, steam cleaning and/or pressure washing is considered process wastewater and is not allowed to comingle with stormwater or enter storm drains. Is process water comingling with stormwater or entering storm drains?		X		
• Illicit discharges include domestic wastewater, noncontact cooling water, or process wastewater (including leachate). Were any illicit discharges observed during the inspection?		X		

II. CORRECTIVE ACTION AND SWPPP MODIFICATIONS DESCRIPTIONS:
Additional space to describe inspection findings and corrective actions if needed. Provide brief explanation of the general location and the rationale for the additional or different BMPs.

Recommend Sweeping area near catch basin to remove accumulated debris

III. CERTIFICATION STATEMENTS AND SIGNATURES:

Inspector - Certification: This section must be completed by the person who conducted the site inspection prior to submitting this form to the person with signature authority (see Permit Condition G2) or a duly authorized representative of that person.

☒ The facility is in compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit.

☐ *The facility is out of compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit. This report includes the remedial actions that must be taken to meet the requirements of the SWPPP and permit, including a schedule of implementation of the remedial actions.*

"I certify that this report is true, accurate, and complete, to the best of my knowledge and belief."

Joshua Barbach	[signature]	Staff EIT	10/29/21
Inspector's Name – Printed	**Inspector's Signature**	**Inspector's Title**	**Date**

Permittee – Certification:

☐ The facility is in compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit.

☐ *The facility is out of compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit. This report includes the remedial actions that must be taken to meet the requirements of the SWPPP and permit, including a schedule of implementation of the remedial actions.*

"I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

PRINTED NAME of person with **Signature Authority** (permit condition G2.A) or a **Duly Authorized Representative**[1]	SIGNATURE of person with **Signature Authority** (permit condition G2.A) or a **Duly Authorized Representative**[1]	**DATE**

[1]A person is duly authorized representative only if 1) the authorization is made in writing by a person described in Permit Condition G2.A and submitted to Ecology, and 2) the authorization specifies either an individual or a position having responsibility for the overall operation of the regulated *facility*, such as the position of plant manager, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters.

Industrial Stormwater General Permit
Annual Report Form

Permit No. WAR-309612
Site Name: PSG Tacoma
Site County: Pierce

DEPARTMENT OF ECOLOGY State of Washington

Use this form to submit your annual report to Ecology. This form is not protected. Use your F11 key to maneuver through the fields. Attach corrective action documentation, and/or additional sheets if necessary. All facilities must submit a signed annual report each year on or before May 15th. Retain a copy of your submitted report onsite for Ecology review.

1. Benchmarks Exceeded

This report is based on samples collected during calendar year 2021.

Did you exceed the benchmark for any parameter during the above noted calendar year (Jan 1st – Dec 31st)?
Note: If you sampled a parameter (other than pH or visible oil sheen) at a discharge point more than once during a quarter, the average of the sample results must be compared to the benchmark.

Yes ☒ - **Complete Sections 2 and 3 and sign and submit the form as described in Section 4.**
No ☐ - **Complete Section 2, skip Section 3, and sign and submit the form as described in Section 4.**

Include any additional comments here:

2. Stormwater Problems Identified At the Facility

Instructions: Based on the best available information, briefly describe any potential or actual stormwater pollution problem(s) you identified during the previous calendar year (Jan 1st – Dec 31st).

- Sources of available information may include (but may not be limited to): SWPPP reviews, audits made by consultants or providers of technical assistance, inspection reports or other notification made by federal/state/local authorities, visual observations, and/or your facility's monthly site inspections (self-inspections).
- For each problem identified, provide the date you discovered the problem (estimate if necessary).
- Do not include problems discovered through stormwater sampling. This information is covered in Section 3.

Date Problem Discovered:	Describe the Problem:
Date Problem Discovered:	Describe the Problem:
Date Problem Discovered:	Describe the Problem:
Date Problem Discovered:	Describe the Problem:

3. Corrective Actions Planned or Taken

Instructions: Complete this section for each pollutant parameter (e.g., turbidity, copper) that exceeded a benchmark during the previous calendar year (Jan 1st – Dec 31st). The permit requires you to identify the condition triggering the need for corrective action review. To do this, indicate below which quarters had a sample result that exceeded the benchmark. If more than one sample was taken at a sample location, indicate which quarters had an average sample result that exceeded the benchmark. Note: If you exceeded the benchmark for more than one parameter (e.g., turbidity and zinc), make additional copies of Section 3 and complete one for each parameter.

Pollutant Parameter: 5 benchmarks (O&G, Lead, Turbidity, Zinc, Copper) were exceeded during the following quarters (check all that apply):

☒ 1st Quarter (January, February, March)

☐ 2nd Quarter (April, May, June)

☐ 3rd Quarter (July, August, September)

☐ 4th Quarter (October, November, December)

Instructions: *For the pollutant parameter above*, summarize any Level 1, 2, or 3 corrective actions completed during the previous calendar year and include the dates you completed the corrective actions.

☒ Level 1 corrective action

Describe the additional *operational source control* BMPs you implemented (Permit Condition S8.B):

Inspect the storm drain inlet at the sample point prior to forecasted rain events. Sweep and/or vacuum visible sediment in surrounding areas prior to forecasted rain events.

Date corrective action was completed: 5/5/2021

☐ Level 2 corrective action

Describe the additional *structural source control* BMPs you implemented (Permit Condition S8.C):

Date corrective action was completed:

☐ Level 3 corrective action

Describe the additional *treatment* BMPs you implemented (Permit Condition S8.D):

Date corrective action was completed:

Instructions: *For the pollutant parameter listed above*, describe the status of any Level 2 or 3 corrective actions triggered during the previous calendar year, but have not yet been completed. Identify the date you expect to complete corrective actions.

☐ Level 2 corrective action

Describe the status of the corrective action:

Date you expect to complete corrective action:

☐ Level 3 Corrective Action

Describe the status of the corrective action:

Date you expect to complete corrective action:

4. Certification by Permittee

"I certify under penalty of law that this document and all attachments were prepared under my direction, or supervision, in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Anthony Encinias	Pacific Steel Group	3-23-24
Printed Name	**Company**	**Date**

Anthony Encinias

Signature*

***Note: Signature not required if the form is submitted electronically through the Water Quality Permitting Portal**

***Federal regulations require this report to be signed by the following person, or a duly authorized representative:**

A. In the case of corporations, by a responsible corporate officer.
   Note: Responsible Corporate Officer is defined on p.59 of ISGP: http://www.ecy.wa.gov/programs/wq/stormwater/industrial/ISGPFinal2015.pdf
B. In the case of a partnership, by a general partner of a partnership.
C. In the case of sole proprietorship, by the proprietor.
D. In the case of a municipality, state, federal, or other public facility: by either a principal executive officer or ranking elected official.

A person is a duly authorized representative only if:

1. The authorization is made in writing by a person described above and submitted to Ecology.
2. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility, such as the position of plant manager, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters.

Please upload the completed form to the Water Quality Permitting Portal: http://www.ecy.wa.gov/programs/wq/permits/paris/portal.html. Make sure you retain a copy for your records.

- **Click on "Permit Submittals"**
- **Then, click on "My Permits", and**
- **Then, click on "Submittals".**

If you have any issues or questions, please contact Ecology's IT support staff at WQWebPortal@ecy.wa.gov or call 800-633-6193/Option 3

If you have questions about this form, contact the following Ecology staff:			
Location	**Contact Name**	**Phone**	**E-mail**
City of Seattle, and Kitsap, Pierce, and Thurston counties	Josh Klimek	360-407-7451	josh.klimek@ecy.wa.gov
Island, King, and San Juan counties	Clay Keown	360-407-6048	clay.keown@ecy.wa.gov
Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Skagit, Snohomish, Spokane, Stevens, Walla, Whatcom, and Whitman counties.	Shawn Hopkins	360-407-6442	shawn.hopkins@ecy.wa.gov
Benton, Chelan, Clallam, Clark, Cowlitz, Douglas, Grays Harbor, Jefferson, Kittitas, Klickitat, Lewis, Mason, Okanogan, Pacific, Skamania, Wahkiakum, and Yakima counties.	Joyce Smith	360-407-6858	joyce.smith@ecy.wa.gov

To request materials in a format for the visually impaired, call the Water Quality Program at Ecology, 360-407-6600, Relay Service 711, or TTY 877-833-6341.

DEPARTMENT OF ECOLOGY
State of Washington

Industrial Stormwater General Permit Annual Report Form

Permit No. WAR-309612	
Site Name: Pacific Steel Group Tacoma	
Site County: Pierce	

Use this form to submit your annual report to Ecology. This form is not protected. Use your F11 key to maneuver through the fields. Attach corrective action documentation, and/or additional sheets if necessary. All facilities must submit a signed annual report each year on or before May 15th. Retain a copy of your submitted report onsite for Ecology review.

1. Benchmarks Exceeded

This report is based on samples collected during calendar year 2022.

Did you exceed the benchmark for any parameter during the above noted calendar year (Jan 1st – Dec 31st)?
Note: If you sampled a parameter (other than pH or visible oil sheen) at a discharge point more than once during a quarter, the average of the sample results must be compared to the benchmark.

Yes ☒ - **Complete Sections 2 and 3 and sign and submit the form as described in Section 4.**
No ☐ - **Complete Section 2, skip Section 3, and sign and submit the form as described in Section 4.**

Include any additional comments here:

2. Stormwater Problems Identified At the Facility

Instructions: Based on the best available information, briefly describe any potential or actual stormwater pollution problem(s) you identified during the previous calendar year (Jan 1st – Dec 31st).

- Sources of available information may include (but may not be limited to): SWPPP reviews, audits made by consultants or providers of technical assistance, inspection reports or other notification made by federal/state/local authorities, visual observations, and/or your facility's monthly site inspections (self-inspections).
- For each problem identified, provide the date you discovered the problem (estimate if necessary).
- Do not include problems discovered through stormwater sampling. This information is covered in Section 3.

Date Problem Discovered: 5/1/23 **Describe the Problem:** High levels of heavy metals (copper, lead , iron) and sediment sampled from catch basin discharge point.

Date Problem Discovered: **Describe the Problem:**

Date Problem Discovered: **Describe the Problem:**

Date Problem Discovered: **Describe the Problem:**

3. Corrective Actions Planned or Taken

Instructions: Complete this section for each pollutant parameter (e.g., turbidity, copper) that exceeded a benchmark during the previous calendar year (Jan 1st – Dec 31st). The permit requires you to identify the condition triggering the need for corrective action review. To do this, indicate below which quarters had a sample result that exceeded the benchmark. If more than one sample was taken at a sample location, indicate which quarters had an average sample result that exceeded the benchmark. Note: If you exceeded the benchmark for more than one parameter (e.g., turbidity and zinc), make additional copies of Section 3 and complete one for each parameter.
Pollutant Parameter: benchmark was exceeded during the following quarters (check all that apply): ☒ 1st Quarter (January, February, March) ☒ 2nd Quarter (April, May, June) ☒ 3rd Quarter (July, August, September) ☒ 4th Quarter (October, November, December)
Instructions: *For the pollutant parameter above*, summarize any Level 1, 2, or 3 corrective actions completed during the previous calendar year and include the dates you completed the corrective actions.
☐ Level 1 corrective action Describe the additional *operational source control* BMPs you implemented (Permit Condition S8.B): Date corrective action was completed: ☒ Level 2 corrective action Describe the additional *structural source control* BMPs you implemented (Permit Condition S8.C): Inspection and sweeping of catch basin sediment. Date corrective action was completed: 11/23/2011 ☐ Level 3 corrective action Describe the additional *treatment* BMPs you implemented (Permit Condition S8.D): Date corrective action was completed:
Instructions: *For the pollutant parameter listed above*, describe the status of any Level 2 or 3 corrective actions triggered during the previous calendar year, but have not yet been completed. Identify the date you expect to complete corrective actions.
☐ Level 2 corrective action Describe the status of the corrective action: Date you expect to complete corrective action: ☒ Level 3 Corrective Action Describe the status of the corrective action: An active treatment system is being implemented to address the high concentration of heavy metal pollutants onsite. Date you expect to complete corrective action: 9/30/2023

4. Certification by Permittee

"I certify under penalty of law that this document and all attachments were prepared under my direction, or supervision, in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Anthony Encinias	Pacific Steel Group	5-16-2023
Printed Name	**Company**	**Date**

Signature*

***Note:** **Signature not required if the form is submitted electronically through the Water Quality Permitting Portal**

***Federal regulations require this report to be signed by the following person, or a duly authorized representative:**

A. In the case of corporations, by a responsible corporate officer.
 Note: Responsible Corporate Officer is defined on p.59 of ISGP:
 http://www.ecy.wa.gov/programs/wq/stormwater/industrial/ISGPFinal2015.pdf
B. In the case of a partnership, by a general partner of a partnership.
C. In the case of sole proprietorship, by the proprietor.
D. In the case of a municipality, state, federal, or other public facility: by either a principal executive officer or ranking elected official.

A person is a duly authorized representative only if:

1. The authorization is made in writing by a person described above and submitted to Ecology.
2. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility, such as the position of plant manager, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters.

Please upload the completed form to the Water Quality Permitting Portal:
http://www.ecy.wa.gov/programs/wq/permits/paris/portal.html. Make sure you retain a copy for your records.

- **Click on "Permit Submittals"**
- **Then, click on "My Permits", and**
- **Then, click on "Submittals".**

If you have any issues or questions, please contact Ecology's IT support staff at WQWebPortal@ecy.wa.gov or call 800-633-6193/Option 3

If you have questions about this form, contact the following Ecology staff:

Location	Contact Name	Phone	E-mail
City of Seattle, and Kitsap, Pierce, and Thurston counties	Josh Klimek	360-407-7451	josh.klimek@ecy.wa.gov
Island, King, and San Juan counties	Clay Keown	360-407-6048	clay.keown@ecy.wa.gov
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APPENDIX 3: Discharge Monitoring Report Table

Late Discharge Monitoring Reports

End Monitoring Period	Due Date	Date Received
Dec 2021	2/15/2022	3/19/2022
Mar 2022	5/15/2022	6/16/2022
Jun 2022	8/15/2022	9/16/2022
Sep 2022	11/15/2022	12/17/2022
Dec 2022	2/15/2023	5/5/2023