



NPDES Compliance Inspection Report

Tacoma Yard – DTG Recycle

Tacoma, WA

Permit # WAR307170

Inspection Date: February 26, 2021

Prepared by:

Rachel Stephenson

U.S. Environmental Protection Agency, Region 10

Enforcement and Compliance Assurance Division

Water Enforcement and Field Branch

Field, Data, and Drinking Water Enforcement Section

Inspector Signature/Date:

RACHEL STEPHENSON

Digitally signed by RACHEL STEPHENSON
Date: 2021.03.19 11:35:24 -07'00'

Supervisor Signature/Date:

PETER CONTRERAS

Digitally signed by PETER CONTRERAS
Date: 2021.03.19 16:28:21 -07'00'

Table of Contents

- I. Facility Information
- II. Inspection Information
- III. Permit Information
- IV. Inspection Chronology
- V. Background and Activity
- VI. Facility Review
- VII. Records Review
- VIII. Areas of Concern
- IX. Closing Conference

Attachments

- A. Aerial Map
- B. Photo Log

[Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Sheldon, Mr. Jerome, Mr. Lawson, and Mr. Jones; or from observations during the inspection.]

I. Facility Information

Facility Name:	Tacoma Yard
Facility Owner/Operator:	DTG Enterprises, Inc. (DTG Recycle)
Facility Contacts:	Mike Sheldon Chief Compliance Officer DTG Recycle Phone: (425) 549-3000 msheldon@dtgrecycle.com Paul Jerome Safety and Compliance Manager DTG Recycle Phone: (425) 549-3000 pjerome@dtgrecycle.com Tom Lawson South General Manager DTG Recycle Phone: (425) 761-4973 Dario Jones Yard Manager Tacoma Yard – DTG Recycle Phone: (425) 877-3096 Brian Thompson Permittee DTG Recycle Phone: (425) 549-3000 brian@dtgrecycle.com
Facility Location:	2117 E River Street Tacoma, WA 98421
Lat/Long:	+ 47.2470197 °, -122.4206285 °
Mailing Address:	P.O. Box 14203 Mill Creek, WA 98082

NPDES Permit Number: WAR307170

II. Inspection Information

Inspection Date: February 26, 2021

Inspector: Rachel Stephenson, Inspector
EPA/R10/ ECAD/WEFB/FDDWES
(206) 553-6366

Arrival Time: 10:00 AM

Departure Time: 10:50 AM

Weather Condition: Partly Cloudy

Receiving Water: River Street Ditch (Puyallup River)

Purpose: This inspection was conducted to document the facility's compliance with the National Pollutant Discharge Elimination System (NPDES), under the Industrial Stormwater General Permit (Permit # WAR307170).

III. Permit Information

This facility is permitted under the State of Washington's Department of Ecology Industrial Stormwater General Permit (ISGP) number WAR307170. The facility operator certified a renewal Notice of Intent (NOI) to discharge pursuant to the permit on May 01, 2019. The permit became effective on January 1, 2020; the expiration date is December 31, 2024. The facility obtained permit coverage under the previous iteration of the ISGP in September of 2018.

This facility has not been inspected by the EPA or the State of Washington Department of Ecology (Ecology) before.

IV. Inspection Chronology

This was an announced inspection. A few days before the inspection, I spoke with Mr. Jerome over the phone; we discussed the logistics of the inspection and agreed upon a start time of 10:00 AM.

For this inspection, I operated as the lead inspector. I arrived at Tacoma Yard at 10:00 AM on February 26, 2021. I met with Mr. Jerome, Mr. Sheldon, Mr. Jones, and Mr. Lawson near the site office. At this time, I identified myself as an EPA inspector and

presented my credentials to them. We also exchanged business cards. I informed them that the purpose of the visit was to conduct a compliance inspection under the facility's NPDES Permit WAR307170 (henceforth, this will be referred to as the Permit). I was not denied access to the facility. I signed in on the visitor check-in sheet, to comply with the facility's COVID-19 protocol.

I conducted the opening conference with Mr. Jerome, Mr. Sheldon, Mr. Jones, and Mr. Lawson outside of the site office. The opening conference involved a discussion of the purpose and expectations of the inspection. Following the opening conference, a facility walk-through took place. At the conclusion of the walk-through, I conducted an in-depth file review in the employee break room. After the file review, I concluded the inspection with a closing conference to discuss observations and notes taken throughout the course of the inspection. I was accompanied throughout the inspection by Mr. Jerome, Mr. Sheldon, Mr. Jones, and Mr. Lawson. I left Tacoma Yard at 10:50 AM.

V. Background and Activity

Tacoma Yard operates as a wood and miscellaneous materials recycling facility in Tacoma, WA. DTG Recycle officially began operating in January of 2019.

DTG Recycle currently employs 7 individuals at Tacoma Yard. Mr. Jerome currently serves as the Safety and Compliance Manager for DTG Recycle. He shares the company's stormwater management responsibilities with Mr. Sheldon, Mr. Lawson, Mr. Jones and the other safety officers. Mr. Sheldon serves as the Chief Compliance Officer for DTG Recycle. Mr. Lawson serves as the South General Manager for DTG Recycle. They both oversee the operations of multiple DTG Recycle facilities, including Tacoma Yard. Mr. Jones serves as the Yard Manager for Tacoma Yard. He generally handles daily operation and stormwater monitoring at Tacoma Yard. Stormwater sampling is typically conducted by a contracted individual from Blue Environmental of Seattle, WA.

According to Mr. Sheldon, the COVID-19 pandemic has had a significant impact on business and operation over the past year. Specifically, the facility had to decrease the number of on-site employees from 10 to 7 and business in general declined in 2020.

VI. Facility Review

Tacoma Yard is located in southeast Tacoma, within the Puyallup Reservation and southwest of the Puyallup River. See **Attachment A**, Aerial Map. According to the NOI, the facility encompasses 3.51 acres of land. The majority of the site is unpaved.

Tacoma Yard functions as a wood and miscellaneous materials recycling and supply yard. Typical daily operations involve trucks entering the facility with loads that are weighed on the scale near the site office. The trucks with the weighed product are then sent to either the wood pile or the miscellaneous materials pile, depending on the

product within the load. Wood products are tipped at the wood pile and miscellaneous products are tipped at the main waste pile. The newly tipped products are then inspected and sorted, depending on the materials. Wood products are sent over to the other DTG Recycle Tacoma facility, referred to as “Recovery 1”. Metal products are sorted in the main operations building and shipped to customers. The remaining miscellaneous materials are separated and either shipped off-site to customers or sent to a landfill (residuals only). Mr. Jerome mentioned that the facility recently installed a drain within the main operations building, which is where metal and other miscellaneous products are sorted and stored for shipment to customers. (See **Attachment B, Photo 22**). This drain was not in use at the time of the inspection. He explained that the drain was installed to collect the water that is used for the misters that spray down the interior of the covered building to prevent dust build-up. He further explained that the water collected in this drain will be pumped to an above-ground holding tank and ultimately transported off-site via the liquid transport trucks.

This facility contains 1 outfall, which is referred to as Outfall 1. According to the facility’s NOI, Outfall 1 discharges stormwater to an unnamed drainage ditch along River Street. This drainage ditch ultimately contributes to the Puyallup River. I did not observe a discharge at the time of the inspection.

Stormwater is collected on-site via trenches that line the perimeter of the facility, or is infiltrated to the ground. Collected stormwater is typically infiltrated to the ground within these trenches. During heavy rain events, the stormwater in the trenches is pumped into liquid transport trucks and hauled off-site. These trucks transport the stormwater to the “Recovery 1” DTG Recycle facility, which has an on-site stormwater treatment system. In cases of unusually heavy rain, stormwater is discharged when the trenches overflow. This point of overflow and consequential stormwater discharge is Outfall 1, which is located in the southeast corner of the facility. Mr. Jerome stated that stormwater discharge is a rare occurrence due to the use of trucks for off-site transport.

Mandatory stormwater monitoring inspections are conducted on a monthly basis, sometimes more frequently when appropriate. Mr. Jerome informed me that he and the other safety officers participate in these monthly inspections. Mr. Jerome further explained that he personally signs off on every inspection report, regardless of which safety officer conducted the monthly inspection. During the monthly inspections, the safety officers monitor stormwater discharge and maintain equipment as needed. Mr. Lawson and Mr. Jones conduct informal daily visual inspections and general upkeep for Tacoma Yard. They informed me that the trenches are inspected on a daily basis.

Mr. Jerome explained that contracted individuals from Blue Environmental help with stormwater sampling. Turbidity, pH, oil & grease (O&G), zinc, lead, and copper samples are taken at Outfall 1 on a quarterly basis, if there is discharge. Additional samples are taken following rain events, if there is discharge. Mr. Jerome explained that the trenches are monitored frequently for observable stormwater discharge. The dates of additional visual monitoring are recorded in the facility’s quarterly sampling

reports. SPECTRA Laboratories of Tacoma, WA handles the analysis of all stormwater samples for Tacoma Yard. Mr. Thompson compiles and submits the Discharge Monitoring Reports (DMRs) to Ecology each quarter.

According to the Annual Report for 2019, the facility reported benchmark exceedances for turbidity and copper in the 1st and 2nd Quarters. They completed a Level 1 corrective action in response, which included a SWPPP update. They also completed a Level 2 corrective action in response, which included the installation of the trenches for additional stormwater retention. No other instances of benchmark exceedance have been reported.

See **Attachment A**, which is an aerial map of the facility. See **Attachment B**, which is photographic documentation of the facility as seen during the site review.

VII. Records Review

The following documents were reviewed:

- Stormwater Pollution Prevention Plan (SWPPP) – A copy of the current SWPPP was on-site at the time of the inspection. The most recent revision was dated 1/27/2020. The SWPPP was prepared and revised by Blue Environmental. I conducted an in-depth review of the SWPPP during the inspection.
- Current NPDES Industrial Stormwater General Permit – There was an electronic copy of the current iteration of the permit on-site at the time of the inspection.
- Stormwater Sampling Logs and Analysis Records – There were sampling records, chain-of-custody forms, and laboratory analysis reports for 2019 and 2020 on-site at the time of the inspection. Electronic copies of the sampling records for Q2, Q3, and Q4 of 2020 were provided to me following the inspection.
- Monthly Inspection Reports – The Inspection Reports for 2019, 2020, and 2021 were on-site at the time of the inspection. The date of the most recent inspection was 1/29/2021. Electronic copies of the monthly inspection reports for April and May of 2020 were provided to me following the inspection.
- Annual Reports – There was a copy of the Annual Reports for 2019 on-site at the time of the inspection.
- Discharge Monitoring Reports (DMRs) – There was a copy of the DMR for Q1 of 2019 on-site at the time of the inspection.

VIII. Areas of Concern

A. Unmonitored Discharge Points

Section S4.B.2.a. of the Permit states that, “the Permittee shall designate sampling location(s) at the point(s) where it discharges stormwater associated with industrial activity off-site.” **Section S4.B.2.d.** of the Permit states that, “the Permittee shall notify Ecology of any changes or updates to sample locations, discharge points, and/or outfalls by submitting an “Industrial Stormwater General Permit Discharge/Sample Point Update Form” to Ecology.” This section of the Permit further states that, “the Permittee may be required to provide additional information to Ecology prior to changing sampling locations.”

During the inspection, Mr. Lawson pointed out a location where there was potential for stormwater to be discharged off-site. This potential discharge point is located in the far western corner of the property, near the site office and facility entrance where load trucks enter and exit. (See **Attachment B, Photos 27-29**). Mr. Lawson explained that he conducts visual monitoring of this location, but stormwater sampling does not take place there.

B. Representative Sampling

Section S4.B.1.d. of the Permit states that, “the Permittee shall obtain representative samples, which may be a single grab sample, a time-proportional sample, or a flow-proportional sample.” **Section S4.B.2.d.** of the Permit states that, “the Permittee shall notify Ecology of any changes or updates to sample locations, discharge points, and/or outfalls by submitting an “Industrial Stormwater General Permit Discharge/Sample Point Update Form” to Ecology.”

During the inspection, I noted that there didn’t appear to be a clear point of stormwater discharge at the trench that contributes to Outfall 1 (See **Attachment B, Photos 13 & 14**). I asked the facility representatives if they knew where the stormwater samples are typically collected. They explained that there hasn’t been an observable discharge since they installed the trenches in Q3 of 2019, so the exact sampling point hasn’t been identified yet. I explained that stormwater samples must be representative of the facility’s industrial activities and associated stormwater discharge. I further explained that having multiple discharge points (i.e. if the entire trench overflows) could require multiple sampling points.

C. Incomplete SWPPP - Sampling Plan

Section S3.B.5. of the Permit states that, “the SWPPP shall include a sampling plan.” This section of the Permit further states that, “the plan shall:

- a. Identify points of discharge to surface water, storm sewers, or discrete groundwater infiltration locations, such as dry wells or detention ponds.

- b. Include documentation of why applicable parameters are not sampled at each discharge point per S4.B.3 (if applicable). The required documentation includes:
 - i. Location of which discharge points the Permittee does not sample applicable parameters because the pollutant concentrations are substantially identical to a discharge point being sampled.
 - ii. General industrial activities conducted in the drainage area of each discharge point.
 - iii. Best Management Practices conducted in the drainage area of each discharge point.
 - iv. Exposed materials located in the drainage area of each discharge point that are likely to be significant contributors of pollutants to stormwater discharges.
 - v. Impervious surfaces in the drainage area that could affect the percolation of stormwater runoff into the ground (e.g., asphalt, crushed rock, grass).
 - vi. Reasons why the Permittee expects the discharge points to discharge substantially identical effluents.
- c. Identify each sampling location by its unique identifying number such as A1, A2.
- d. Identify staff responsible for conducting stormwater sampling.
- e. Specify procedures for sample collection and handling.
- f. Specify procedures for sending samples to a laboratory.
- g. Identify parameters for analysis, holding times and preservatives, laboratory quantitation levels, and analytical methods.
- h. Specify the procedure for submitting results to Ecology.

During the file review portion of the inspection, I conducted an in-depth analysis of the current SWPPP. I noted that the sampling plan did not include sampling point locations. During the closing conference of the inspection, I mentioned that the SWPPP needs to reflect the current sampling plan, including specific sampling locations. The facility representatives explained that there hasn't been an observable discharge since they installed the trenches in Q3 of 2019, so the exact sampling point hasn't been identified yet. I recommended that they identify a sampling location and update the SWPPP to reflect this information. Mr. Jerome indicated that he would work with Blue Environmental to update the SWPPP following the inspection.

D. Incomplete SWPPP – Site Map

Section S3.B. of the Permit states that, “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.” **Section S4.B.1.** of the Permit states that, “the site map shall identify (site map may be multiple pages if needed):

- a. The scale or include relative distances between significant structures and drainage systems.
- b. The size of the property in acres.
- c. The location and extent of all buildings, structures and all impervious surfaces.
- d. Direction of stormwater flow (use arrows).
- e. Locations of all structural source control BMPs.
- f. Locations of all receiving water (including wetlands and drainage ditches) in the immediate vicinity of the facility.
- g. Conditionally approved non-stormwater discharges.
- h. Areas of existing and potential soil erosion that could result in the discharge of a significant amount of turbidity, sediment, or other pollutants.
- i. Locations of all stormwater conveyances including ditches, pipes, catch basins, vaults, ponds, swales, etc.
- j. Locations of actual and potential pollutant sources.
- k. Locations of all stormwater monitoring points.
- l. The stormwater drainage areas for each stormwater discharge point off site (including discharges to groundwater).
- m. Locations of stormwater inlets and outfalls with a unique identification number for each sampling point and discharge point, indicating any that are identified as substantially identical, and identify, by name, any other party other than the Permittee that owns any stormwater drainage or discharge structures.
- n. Combined sewers or MS4s and where stormwater discharges to them.
- o. Locations of fueling and vehicle maintenance areas.
- p. Locations and sources of run-on to your site from adjacent properties that may contain pollutants.”

During the file review portion of the inspection, I conducted an in-depth review of the SWPPP. I noted that the site map contained information regarding industrial activity and pollutant sources, but was missing information pertaining to stormwater monitoring. Specifically, direction of stormwater flow, stormwater sampling locations, and outfalls were not indicated on the map. During the closing conference of the inspection, I mentioned that the site map needs to reflect the current stormwater

monitoring information. Mr. Jerome indicated that he would work on updating the site map following the inspection.

E. Records Retention - DMRs

Section S9.D.1. of the Permit states that, “the Permittee shall retain the following documents onsite for a minimum of five years:

- a. A copy of this permit.
- b. A copy of the permit coverage letter.
- c. Records of all sampling information specified in Condition S4.B.3.
- d. Inspection reports including documentation specified in Condition S7.
- e. Any other documentation of compliance with permit requirements.
- f. All equipment calibration records.
- g. All BMP maintenance records.
- h. All original recordings for continuous sampling instrumentation.
- i. Copies of all laboratory reports as described in Condition S3.B.4.
- j. Copies of all reports required by this permit.
- k. Records of all data used to complete the application for this permit.”

During the file review portion of the inspection, I noted that only the DMR for Q1 of 2019 was available on-site. However, I was able to review the remaining DMRs for 2019-2020 before and after the inspection, using Ecology’s Permitting and Reporting Information System (PARIS). During the closing conference of the inspection, I mentioned to the facility representatives that all stormwater management and Permit-related records should be kept on-site, including DMRs. They indicated that the DMRs would be printed following the inspection and kept with the rest of the stormwater documents in the SWPPP binder on-site.

IX. Closing Conference

A closing conference was held with Mr. Jerome, Mr. Sheldon, Mr. Lawson, and Mr. Jones to discuss my inspection observations. I thanked them for their time and cooperation with the inspection. I left the facility at 10:50 AM.

ATTACHMENT A

Aerial Map



ATTACHMENT B

Photograph Log

All photographs taken by Rachel Stephenson on February 26,
2021 Nikon Coolpix AW120, Serial # 32057443

Photo Log – Tacoma Yard

Photo #:01 (DSCN0750)

Description: Facing north, photo of the miscellaneous materials tipping pile near the main operations building.



Photo #:02 (DSCN0751)

Description: Facing south, photo of concrete blocks along the property line.



Photo #:03 (DSCN0752)

Description: Photo of materials stored in a freight container.



Photo #:04 (DSCN0753)

Description: Facing south, photo of one of the spill kits. Mr. Jerome informed me that there are 5 spill kits on-site.

Photo Log – Tacoma Yard

Photo #:05 (DSCN0754)
Description: Photo of one of the spill kits.



Photo #:06 (DSCN0755)
Description: Facing south, photo of stormwater collecting in a shallow trench. Note the concrete blocks bordering the trench and property line.



Photo #:07 (DSCN0756)
Description: Facing southeast, photo of empty product storage containers.



Photo #:08 (DSCN0757)
Description: Facing southeast, photo of the storage yard area.

Photo Log – Tacoma Yard

Photo #:09 (DSCN0758)

Description: Facing south, photo of stormwater pooling near the empty storage containers.



Photo #:10 (DSCN0759)

Description: Facing southeast, photo of stormwater pooling near a parked vehicle.



Photo #:11 (DSCN0760)

Description: Facing southeast, photo of stormwater pooling in the trench along the southern perimeter.



Photo #:12 (DSCN0761)

Description: Facing south, photo of an old liquid containment drum. Mr. Lawson explained that this was left on the property by the previous tenants. It was not in use at the time of the inspection.

Photo Log – Tacoma Yard

Photo #:13 (DSCN0762)

Description: Facing east, photo of the stormwater trench that contributes to Outfall 1.



Photo #:14 (DSCN0763)

Description: Facing northeast, photo of the approximate location of Outfall 1 and the stormwater sampling point. Note the full drainage ditch on the other side of the fence line.



Photo #:15 (DSCN0764)

Description: Facing northwest, photo of freight containers in the storage yard area.



Photo #:16 (DSCN0765)

Description: Facing northeast, photo of stormwater pooling near an empty freight container.

Photo Log – Tacoma Yard

Photo #:17 (DSCN0766)

Description: Facing northwest, photo of stormwater pooling in the yard.



Photo #:18 (DSCN0767)

Description: Facing north, photo of concrete blocks that were installed to act as a barrier around the materials tipping and sorting area.



Photo #:19 (DSCN0768)

Description: Facing north, photo of concrete blocks that were installed to act as a barrier around the materials tipping and sorting area.



Photo #:20 (DSCN0769)

Description: Facing northwest, photo of the wood tipping pile outside of the main operations building.

Photo Log – Tacoma Yard

Photo #:21 (DSCN0770)

Description: Facing north, photo of the concrete blocks that were installed to act as a barrier around the materials tipping and sorting area.



Photo #:22 (DSCN0771)

Description: Facing southeast, photo of the interior of the main operations building. The recently installed drain is located in the middle of the building floor.



Photo #:23 (DSCN0772)

Description: Facing northeast, photo of stormwater pooling near the concrete block barrier.



Photo #:24 (DSCN0773)

Description: Facing southeast, photo of materials stored within a freight container.

Photo Log – Tacoma Yard



Photo #:25 (DSCN0774)

Description: Facing south, photo of a catwalk and product processing equipment near the main operations building.



Photo #:26 (DSCN0775)

Description: Facing west, photo of stormwater pooling along the northwestern perimeter. Note the concrete blocks.



Photo #:27 (DSCN0776)

Description: Facing southwest, photo of point of potential stormwater discharge (not currently sampled).



Photo #:28 (DSCN0777)

Description: Facing southwest, photo of the point of potential stormwater discharge (not currently sampled).

Photo Log – Tacoma Yard



Photo #:29 (DSCN0778)

Description: Facing northwest, photo of the pattern of stormwater contributing to and potentially discharging from the unmonitored location.



Photo #:30 (DSCN0779)

Description: Facing north, photo of the strip drain that routes water to the unmonitored potential discharge point.



Photo #:31 (DSCN0780)

Description: Facing east, photo of the main operations building, miscellaneous materials tipping pile, and equipment.

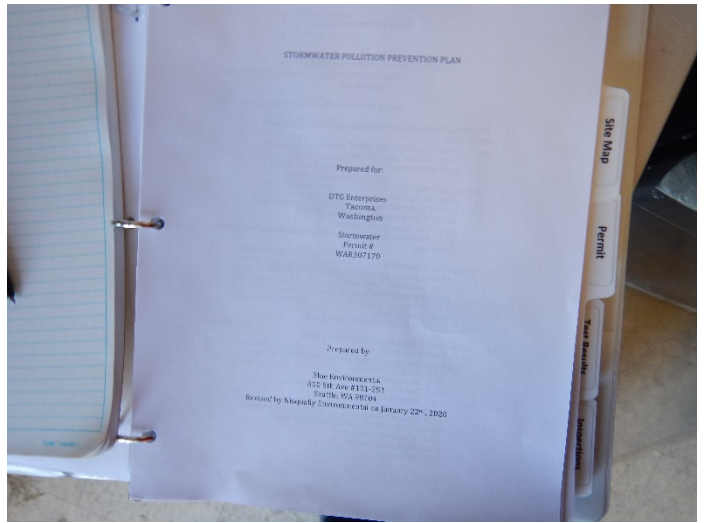


Photo #:32 (DSCN0781)

Description: Photo of the cover page of the current SWPPP.