



NPDES Compliance Inspection Report

AWR Redmond Yard – DTG Recycle

Redmond, WA

Permit # WAR305821

Inspection Date: February 25, 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 07:59:55 -07'00'

Supervisor Signature/Date:

PETER CONTRERAS Digitally signed by PETER CONTRERAS Date: 2021.03.19 08:34:04 -07'00'

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

I. Facility Information

Facility Name: All Wood Recycling (AWR) Redmond Yard

Facility Owner/Operator: DTG Enterprises, Inc. (DTG Recycle)

Facility Contacts: Mike Sheldon
Chief Compliance Officer
DTG Recycle
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Paul Jerome
Safety and Compliance Manager
DTG Recycle
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Yard Manager
AWR Redmond Yard – DTG Recycle
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Brian Thompson
Permittee
DTG Recycle
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brian@dtgreecycle.com

Facility Location: 8504 192nd Ave NE
Redmond, WA 98053

Lat/Long: +47.6781745°, -122.084134°

Mailing Address: P.O. Box 14203
Mill Creek, WA 98082

NPDES Permit Number: WAR305821

II. Inspection Information

Inspection Date: February 25, 2021

Inspector:	Rachel Stephenson, Inspector EPA/R10/ ECAD/WEFB/FDDWES (206) 553-6366
Arrival Time:	11:00 AM
Departure Time:	12:00 PM
Weather Condition:	Overcast; Light Rain
Receiving Water:	Unnamed Riparian Area (Evans Creek)
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 # WAR305821).

III. Permit Information

This facility is permitted under the State of Washington's Department of Ecology Industrial Stormwater General Permit (ISGP) number WAR305821. The facility operator certified a renewal Notice of Intent (NOI) to discharge pursuant to the permit on May 02, 2019. The permit became effective on January 1, 2020; the expiration date is December 31, 2024.

This facility was last inspected by the State of Washington Department of Ecology (Ecology) in April of 2019.

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 11:00 AM.

For this inspection, I operated as the lead inspector. I arrived at AWR Redmond Yard at 11:00 AM on February 25, 2021. I met with Mr. Jerome and Mr. Sheldon in 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 WAR305821 (henceforth, this will be referred to as the Permit). I was not denied access to the facility.

I conducted the opening conference with Mr. Jerome and Mr. Sheldon in 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 site office. 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 and Mr. Sheldon, with L.J. Ganem joining us for the facility walk-through. I left AWR Redmond Yard at 12:00 PM.

V. Background and Activity

AWR Redmond Yard operates as a wood and concrete recycling facility in Redmond, WA. The facility was previously owned by All Wood Recycling (AWR), DTG Recycle took over ownership of the property in 2017.

DTG Recycle currently employs 3 individuals at AWR Redmond 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. Ganem, and the other safety officers. Mr. Sheldon serves as the Chief Compliance Officer for DTG Recycle. He oversees the operations of multiple DTG Recycle facilities, including AWR Redmond Yard. Mr. Ganem serves as the Yard Manager for AWR Redmond Yard. He generally handles daily operation, Best Management Practices (BMP) implementation, and stormwater monitoring at AWR Redmond 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 4 to 3 and business in general declined in 2020.

VI. Facility Review

AWR Redmond Yard is located in eastern Redmond, with Evans Creek running through the middle of the facility. See **Attachment A**, Aerial Map. According to the NOI, the facility encompasses 4.77 acres of land. About half of the facility is paved.

AWR Redmond Yard functions as a wood and concrete 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 concrete pile, depending on the product within the load. Wood products are tipped at the wood pile and concrete products are tipped at the concrete pile. The newly tipped products are then inspected and processed, depending on the materials. Wood products are sent through a mobile wood chipper and then shipped to customers. Concrete products are crushed with specialized crushing equipment and then shipped to customers. Miscellaneous waste materials that are collected during the product inspections are placed in a covered pile and taken off-site for disposal at a waste management facility.

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 riparian area along Evans Creek. I did not observe a discharge at the time of the inspection.

Stormwater is collected on-site via a series of catch basins, or is infiltrated to the ground within the unpaved portion of the facility. Collected stormwater is then routed from these catch basins to an oil/water separator. After running through the oil/water separator, stormwater is pumped to an infiltration pond at the rear of the facility. From there, stormwater is only discharged when the infiltration pond overflows. This point of overflow and consequential stormwater discharge is Outfall 1. Mr. Jerome stated that stormwater discharge is a rare occurrence. The previously utilized injection well system was abandoned in 2017. Mr. Sheldon informed me that the well system will soon be decommissioned by the City of Redmond. There is a covered diesel refueling station that drains to a dead-end sump, according to Mr. Jerome.

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. Ganem conducts BMP implementation and upkeep for AWR Redmond Yard. He informed me that the yard is swept several times per week, the filter socks within the catch basins are replaced twice per week, and the silt fence lining the portion of Evans Creek that bisects the property is inspected several times per week.

Mr. Jeromes explained that contracted individuals from Blue Environmental help with stormwater sampling. Turbidity, pH, oil & grease (O&G), fecal coliform, zinc, copper, and lead samples are taken at Outfall 1 on a quarterly basis, if there is discharge. Additional samples are taken followings rain events, if there is discharge. Mr. Jerome explained that the infiltration pond is monitored frequently for observable stormwater discharge. The dates of additional visual monitoring are recorded in the facility's quarterly sampling reports. Fremont Analytical of Seattle, WA handles the analysis of all stormwater samples for AWR Redmond Yard. Mr. Thompson compiles and submits the Discharge Monitoring Reports (DMRs) to Ecology each quarter.

According to the Annual Report for 2018, the facility reported a benchmark exceedance for zinc in the 1st Quarter. They completed a Level 1 corrective action in response, which included a SWPPP update. 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 1/16/2020. The SWPPP was prepared and revised by Blue Environmental. I conducted an in-depth review of the SWPPP during the inspection. An electronic copy was also provided to me following 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 2018 on-site at the time of the inspection. Electronic copies of the sampling records for 2017, 2018, 2019, and 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 2/25/2021. Electronic copies of the monthly inspection reports for 2017, 2018, 2019, and 2020 were provided to me following the inspection.
- Annual Reports – There were copies of the Annual Reports for 2017, 2018, and 2019 on-site at the time of the inspection. Electronic copies were also provided to me following the inspection.
- Discharge Monitoring Reports (DMRs) – There was a copy of the DMR for Q4 of 2020 on-site at the time of the inspection.
- Operation & Maintenance Log (O&M) – There was a copy of the facility's operation and maintenance log on-site at the time of the inspection.

VIII. Areas of Concern

A. 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.”

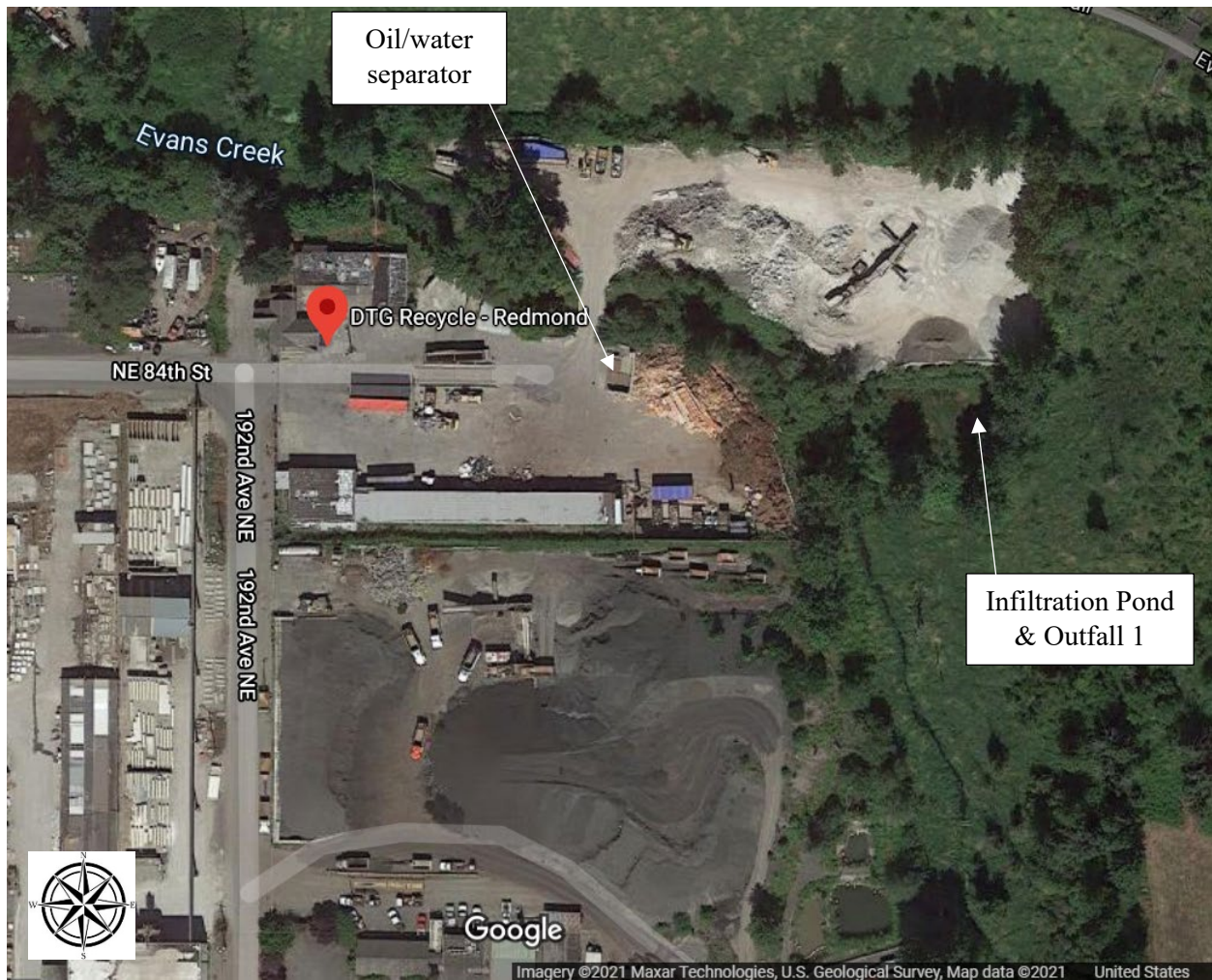
During the file review portion of the inspection, I noted that only the DMR for Q4 of 2020 was available on-site. However, I was able to review the remaining DMRs for 2017-2020 before and after the inspection, using Ecology’s Permitting and Reporting Information System (PARIS). During the closing conference of the inspection, I mentioned to Mr. Jerome and Mr. Sheldon 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 and Mr. Sheldon to discuss my inspection observations. I thanked them for their time and cooperation with the inspection. I left the facility at 12:00 PM.

ATTACHMENT A

Aerial Map



ATTACHMENT B

Photograph Log

All photographs taken by Rachel Stephenson on February 25,
2021 Nikon Coolpix AW120, Serial # 32057443

Photo Log – AWR Redmond Yard

Photo #:01 (DSCN0704)

Description: Facing east, photo of the facility entrance, truck scale, and site office.



Photo #:02 (DSCN0705)

Description: Facing north, photo of the facility entrance and site office.



Photo #:03 (DSCN0706)

Description: Facing north, photo of the yard sweeper.



Photo #:04 (DSCN0707)

Description: Facing northwest, photo of a covered dumpster near the site office.

Photo Log – AWR Redmond Yard

Photo #:05 (DSCN0708)

Description: Facing northeast, photo of the covered diesel refueling station.



Photo #:06 (DSCN0709)

Description: Facing north, photo of the spill kit at the covered diesel refueling station.



Photo #:07 (DSCN0710)

Description: Facing north, photo of the spill kit at the covered diesel refueling station.



Photo #:08 (DSCN0711)

Description: Facing southwest, photo of the truck scale and product transport equipment.

Photo Log – AWR Redmond Yard

Photo #:09 (DSCN0712)

Description: Facing southeast, photo of one of the catch basins that route stormwater to the oil/water separator.



Photo #:10 (DSCN0713)

Description: Facing east, photo of the paved yard area with the wood pile in the back.



Photo #:11 (DSCN0714)

Description: Facing north, photo of the bridge that crosses over Evans Creek.



Photo #:12 (DSCN0715)

Description: Facing northwest, photo of Evans Creek.

Photo Log – AWR Redmond Yard

Photo #:13 (DSCN0716)

Description: Facing southeast, photo of the silt fence that lines Evans Creek.



Photo #:14 (DSCN0717)

Description: Facing northeast, photo of the dense vegetation and concrete blocks that line Evans Creek.



Photo #:15 (DSCN0718)

Description: Facing east, photo of a catch basin that routes stormwater to the oil/water separator.



Photo #:16 (DSCN0719)

Description: Facing south, photo of the pipe (lining the bridge) that routes stormwater from the catch basin to the oil/water separator.

Photo Log – AWR Redmond Yard

Photo #:17 (DSCN0720)

Description: Facing northwest, photo of stored materials near the mobile rock crusher.



Photo #:18 (DSCN0721)

Description: Facing west, photo of the mobile rock crusher.



Photo #:19 (DSCN0722)

Description: Facing east, photo of the concrete processing side of the facility. This side of the facility is mostly unpaved. The blue containers are empty storage bins.



Photo #:20 (DSCN0723)

Description: Facing northeast, photo of the empty storage bins within the concrete processing side of the facility.

Photo Log – AWR Redmond Yard

Photo #:21 (DSCN0724)

Description: Facing east, photo of the concrete pile, concrete blocks lining the property, and empty storage containers. Note the stormwater pooling.



Photo #:22 (DSCN0725)

Description: Facing east, photo of the empty storage containers near the concrete pile.



Photo #:23 (DSCN0726)

Description: Facing northeast, photo of the concrete pile.



Photo #:24 (DSCN0727)

Description: Facing southwest, photo of the stormwater infiltration pond.

Photo Log – AWR Redmond Yard

Photo #:25 (DSCN0728)

Description: Facing southwest, photo of the overflow point that discharges stormwater through Outfall 1.



Photo #:26 (DSCN0729)

Description: Facing west, photo of the dense vegetation (cattails) within the infiltration pond.



Photo #:27 (DSCN0730)

Description: Facing southwest, photo of the stormwater sampling bottle. The bottle is kept in the black housing for ease of access if discharge is ever observed.



Photo #:28 (DSCN0731)

Description: Facing east, photo of Outfall 1 and the riparian area that stormwater would discharge to.

Photo Log – AWR Redmond Yard

Photo #:29 (DSCN0732)

Description: Facing west, photo equipment and containers within the concrete processing area.



Photo #:30 (DSCN0733)

Description: Facing east, photo of the oil/water separator.



Photo #:31 (DSCN0734)

Description: Photo of one of the catch basins in the paved portion of the facility.



Photo #:32 (DSCN0735)

Description: Facing southwest, photo of the miscellaneous waste pile that gets transferred off-site for disposal at a waste management facility.

Photo Log – AWR Redmond Yard

Photo #:33 (DSCN0736)

Description: Photo of one of the catch basins within the paved portion of the facility.



Photo #:34 (DSCN0737)

Description: Facing southeast, photo of stormwater pooling near discarded wood products.



Photo #:35 (DSCN0738)

Description: Facing north, photo of the wood pile.



Photo #:36 (DSCN0739)

Description: Facing south, photo of the old wellhouse. This wellhouse will soon be decommissioned by the City of Redmond.

Photo Log – AWR Redmond Yard

Photo #:37 (DSCN0740)

Description: Facing west, photo of water pooling the paved portion of the yard.



Photo #:38 (DSCN0741)

Description: Facing south, photo of discarded materials near the covered storage shed. Note the neighboring facility's large pile of product near the property fence line.



Photo #:39 (DSCN0742)

Description: Facing west, photo of visible sheen in the water pooling near the covered miscellaneous waste pile.



Photo #:40 (DSCN0743)

Description: Photo of trash and debris in water pooled near the miscellaneous waste pile.

Photo Log – AWR Redmond Yard



Photo #:41 (DSCN0744)
Description: Photo of one of the catch basins.



Photo #:42 (DSCN0745)
Description: Facing south, photo of one of the catch basins.

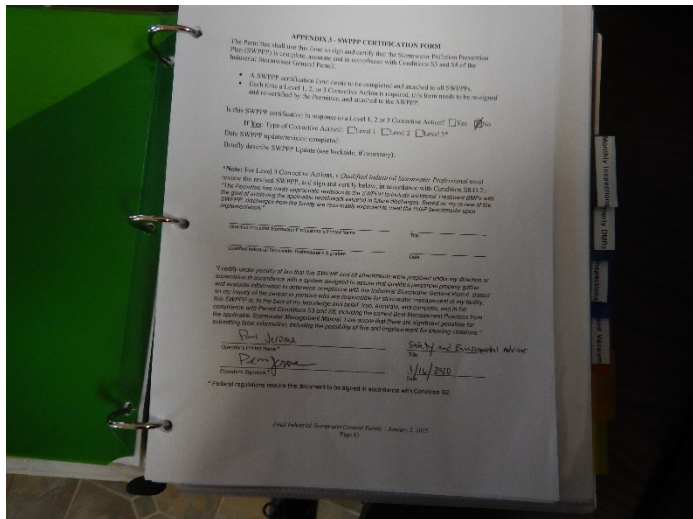


Photo #:43 (DSCN0746)
Description: Photo of most recent SWPPP certification.

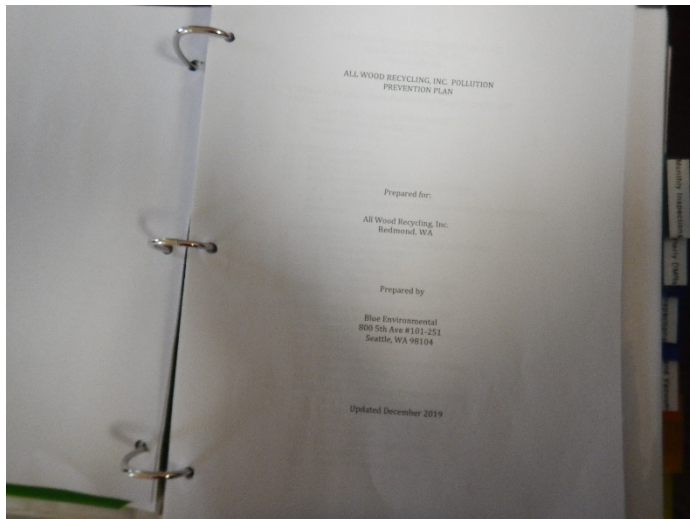


Photo #:44 (DSCN0747)
Description: Photo of the cover page of the SWPPP.