



# NPDES Compliance Inspection Report

## White River Fabrication

**NPDES Permit Tracking Number  
# WAU000668**

**Inspection Date: 05/12/2023**

Prepared by:

Kyle Masters  
U.S. Environmental Protection Agency, Region 10  
Enforcement & Compliance Assurance Division  
Water Enforcement & Field Branch  
Surface Water Enforcement Section

Inspector Signature/Date:

|                             |                                                                                 |
|-----------------------------|---------------------------------------------------------------------------------|
| <b>JONATHAN<br/>MASTERS</b> | Digitally signed by<br>JONATHAN MASTERS<br>Date: 2023.07.12<br>08:09:57 -07'00' |
|-----------------------------|---------------------------------------------------------------------------------|

Supervisor Signature/Date:

|                                        |                                                                                            |
|----------------------------------------|--------------------------------------------------------------------------------------------|
| <b>Marshallonis,<br/>Daniel (Dino)</b> | Digitally signed by<br>Marshallonis, Daniel (Dino)<br>Date: 2023.07.12 09:15:43<br>-07'00' |
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[Unless otherwise noted, all details in this inspection report were obtained from conversations with Jonathan Thomas, or from observations made during the inspection.]

## **I. Facility Information**

|                        |                                                                                                     |
|------------------------|-----------------------------------------------------------------------------------------------------|
| Facility Name:         | White River Fabrication                                                                             |
| Facility Owner:        | Mr. Jonathan Thomas                                                                                 |
| Facility Address:      | 2321 Cole Street, Suite 101<br>Enumclaw, Washington 98022                                           |
| Mailing Address:       | 2321 Cole Street, Suite 101<br>Enumclaw, Washington 98022                                           |
| Facility Contact(s):   | Jonathan Thomas, Owner<br>White River Fabrication<br>(360) 625-8127<br>jt@whiteriverfabrication.com |
| Latitude/Longitude:    | N 47.20883 W -121.98397                                                                             |
| NPDES Tracking Number: | WAU000668                                                                                           |
| NAICS Code(s):         | 332710                                                                                              |
| Facility Size:         | Approximately 0.59 acres, with 0.34 acres exposed                                                   |

## **II. Inspection Information**

|                  |                                                                                                                                                                                             |
|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Inspection Date: | May 12, 2023                                                                                                                                                                                |
| Inspector(s):    | Kyle Masters, Inspector<br>EPA Region 10, ECAD / SWES<br><br>Rose Propst, Inspector<br>Washington Department of Ecology<br><br>Darren Chromey, Source Control Inspector<br>City of Enumclaw |
| Arrival Time:    | 12:00 PM                                                                                                                                                                                    |
| Departure Time:  | 12:25 PM                                                                                                                                                                                    |

|          |                                                                                                                                                                                                                                                |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Weather: | Mostly Sunny                                                                                                                                                                                                                                   |
| Purpose: | To evaluate compliance with the requirements of the Clean Water Act, the National Pollutant Discharge Elimination System (NPDES) and the State Waste Discharge General Permit for Stormwater Discharges Associated with Industrial Activities. |

### **III. Permit Information**

White River Fabrication (“Facility”) currently lacks coverage under the State of Washington Department of Ecology’s Industrial Stormwater General Permit (ISGP). The current version of the ISGP became effective on January 1, 2020 and expires on December 31, 2024. EPA assigned the permit number WAU000668 after this inspection for tracking purposes.

Due to the metal parts manufacturing, machining, and welding services occurring on-site, and the outside storage of materials, the Facility requires permit coverage under the ISGP. Table 1 of the ISGP, at Section S1.A, lists the types of facilities required to obtain permit coverage. Table 3, at Section S5.B., requires metal fabricators (NAICS 332xxx) and machinery manufacturers (NAICS 333xxx) to sample and follow the additional benchmark monitoring program for Lead and Petroleum Hydrocarbons.

### **IV. Facility Background**

White River Fabrication began operations at this Facility approximately 5 years ago in 2018, according to Mr. Thomas. Prior to moving there, the company operated at another facility in the area for about 3 years.

Operations at the Facility consist of mechanical fabrication, welding, and assembly of brewery and distillery equipment. Staff may customize, manufacture, or modify existing parts with a laser cutter, machining tools like rollers, press brakes, welders, and drills. Mr. Thomas referred to the company as a specialized machining shop that serves clients of all sizes in the brewing and distilling sector. They also work with other clients in the food and beverage industry. Due to their specialization, Mr. Thomas told us, they use few chemicals, and in they do use must be food-grade and approved for use in the industry they serve.

Business hours are Monday through Friday, 8AM – 5PM. The Facility employees approximately six staff.

### **V. Inspection Chronology**

This was an unannounced inspection. Upon arriving on-site, I entered the building and found Mr. Thomas. I explained I was conducting unannounced stormwater inspections

in the area that day.

The inspection consisted of an opening conference, a walk-through of the Facility, the outside storage and parking area, stormwater catch basins, and ended with a closing conference. Mr. Thomas accompanied us throughout the Facility tour, left as we examined the outside area, and then met up with us again for the closing conference. No one denied us access of the Facility.

## **VI. Opening Conference**

The opening conference was held shortly after our arrival in Mr. Thomas's office. We introduced ourselves to Mr. Thomas and I presented my inspector credentials. I explained I was in the area leading stormwater inspections that day, and Ms. Propst of Ecology, and Mr. Chromey of the City of Enumclaw had joined me. We then discussed the purpose and scope of the inspection. That is, I was evaluating facilities in the area for their need to obtain coverage with Ecology's Industrial Stormwater General Permit.

During the opening conference Mr. Thomas provided a brief background on the Facility's history and operations. He explained, largely due to the nature of their client base, the Facility is very careful with their processes and diligent about not contaminating products with substances that are not food-grade.

## **VII. Site Review**

According to Mr. Thomas, the Facility consists of the main shop floor where staff use the machining and fabrication tools to manufacture or modify parts to complete work for their customers. They use the outside portion of the Facility for storage, he said. As we walked through the shop, Mr. Thomas pointed out the equipment they use for their work. We saw the laser cutter and a press brake, with tubing, fittings, and apparent brewing equipment in various stages of assembly.

We moved outside the main shop and walked through the outdoor area. Next to the shop, across from the main shop entrance, we saw an open blue metal bin holding scrap metal of various sizes and shapes (**Photo 1**). The bin did not appear to have a storm-resistant lid. We also saw additional metal materials stored on the ground. As we walked through the paved area we saw a wide variety of metal materials stored outside (**Photo 2**). We did see closed dumpsters holding municipal solid waste and cardboard recycling.

We looked at two catch basins in the area, one laying approximately in the middle of the outside storage area, and the other further east. Based on the visible piping, it appeared stormwater flowed generally east, then north, across the Facility. This suggests the nearby retention pond (**Attachment A**) may received stormwater. This directional movement also aligns with the characterization documented in the City of Enumclaw's municipal stormwater plan (**Attachment B**).

Later, during an inspection of a neighboring facility, we saw a white pipe protruding from

the northern wall of the Facility (Photo 3). It appeared to be actively discharging water. At the time, I was unable to determine if the pipe discharged roof runoff, or some other source of water. We did not observe water used in the processes inside the Facility.

## VIII. File Review

I did not review permit-required records during the inspection as the Facility currently lacks ISGP permit coverage. Mr. Thomas told us the Facility does not possess a Stormwater Pollution Prevention Plan.

## IX. Areas of Concern

Observations during the inspection identified the following areas of concern

### A. Industrial Stormwater General Permit Coverage

*Section S1.A.1. of the Permit states, “Facilities engaged in any industrial activities in Table 1 shall apply for coverage if stormwater from the facility discharges to a surface waterbody, or to a storm sewer system that discharges to a surface waterbody.*

*Table 1<sup>1</sup>: Activities Requiring Permit Coverage and the Associated NAICS Groups*

| <b><i>Industrial Activities</i></b>           | <b><i>NAICS Groups</i></b> |
|-----------------------------------------------|----------------------------|
| <i>Primary Metal Manufacturing</i>            | <i>331xxx</i>              |
| <i>Fabricated Metal Product Manufacturing</i> | <i>332xxx</i>              |
| <i>Machinery Manufacturing</i>                | <i>333xxx</i>              |

Based on our observations and conversation with Mr. Thomas, the Facility requires permit coverage. We confirmed the Facility performs industrial activities inline with the above NAICS groups, actively stores potential pollutants outside, and stormwater leaves the Facility and discharges into a municipal storm sewer system and surface waterbodies.

### B. Uncovered Scrap Metal Container

*Section S3.B.4.2.d of the Permit states: “keep all dumpsters under cover or fit with a storm-resistant lid that must remain closed when not in use.”*

During the inspection I observed an approximately 6-foot-long open bin holding scrap metal without a lid (**Photo 1**).

### C. Stormwater Pollution Prevention Plan (SWPPP)

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<sup>1</sup> The following table serves as an excerpt to the full Table 1, edited for clarity, found in the Permit.

**Section S3.A.** of the Permit states, “All Permittees and applicants for coverage under this permit shall implement a **Stormwater Pollution Prevention Plan (SWPPP)** developed by **qualified personnel** as follows:

1. The SWPPP shall specify the **Best Management Practices (BMPs)** necessary to:

- a. Provide **All Known, Available, and Reasonable methods of prevention, control, and Treatment (AKART)** of stormwater pollution.
- b. Ensure the discharge does not cause or contribute to a violation of the **Water Quality Standards**.
- c. Comply with applicable federal technology-based treatment requirements under 40 CFR § 125.3.

**Section 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.”

During the inspection I observed a lack of Best Management Practices to control potential pollution sources. Mr. Thomas stated the Facility lacked a SWPPP.

D. Sampling Requirements

**Section S4.A.** of the Permit states, “The Permittee shall conduct sampling of stormwater in accordance with this permit and the SWPPP.”

**Section S4.B.1.a.** of the Permit states, “The Permittee shall sample the discharge from each designated location at least once per quarter...”

**Section S5.A.1.** of the Permit states, “Permittees shall sample their stormwater discharges as specified in Condition S4 and as specified in Table 2.”

**Section S5.A.2.** of the Permit states, “Additional requirements apply to specific industrial categories (S5.B)...”

**Table 2: Benchmarks and Sampling Requirements Applicable to All Facilities**

| Parameter     | Units          | Benchmark Value      | Analytical Method | Laboratory Quantitation Limit | Minimum Sampling Frequency |
|---------------|----------------|----------------------|-------------------|-------------------------------|----------------------------|
| Turbidity     | NTU            | 25                   | EPA 180.1 Meter   | 0.5                           | 1/quarter                  |
| pH            | Standard Units | Between 5.0 and 9.0  | Meter/Paper       | +/- 0.5                       | 1/quarter                  |
| Oil Sheen     | Yes/No         | No Visible Oil Sheen | N/A               | N/A                           | 1/quarter                  |
| Copper, Total | µg/L           | Western WA: 14       | EPA 200.8         | 2.0                           | 1/quarter                  |
| Zinc, Total   | µg/L           | 117                  | EPA 200.8         | 2.5                           | 1/quarter                  |

***Table 3: Additional Benchmarks and Sampling Requirements to Specific Industries***

| 2. Primary Metals (331xxx), Metals Fabricating (332xxx), Machinery Manufacturing (333xxx) |       |                 |                   |                               |                            |
|-------------------------------------------------------------------------------------------|-------|-----------------|-------------------|-------------------------------|----------------------------|
| Parameter                                                                                 | Units | Benchmark Value | Analytical Method | Laboratory Quantitation Limit | Minimum Sampling Frequency |
| Lead, Total                                                                               | µg/L  | 64.6            | EPA 200.8         | 0.5                           | 1/quarter                  |
| Petroleum Hydrocarbons (Diesel Fraction)                                                  | Mg/L  | 10              | NWTPH-Dx          | 0.25                          | 1/quarter                  |

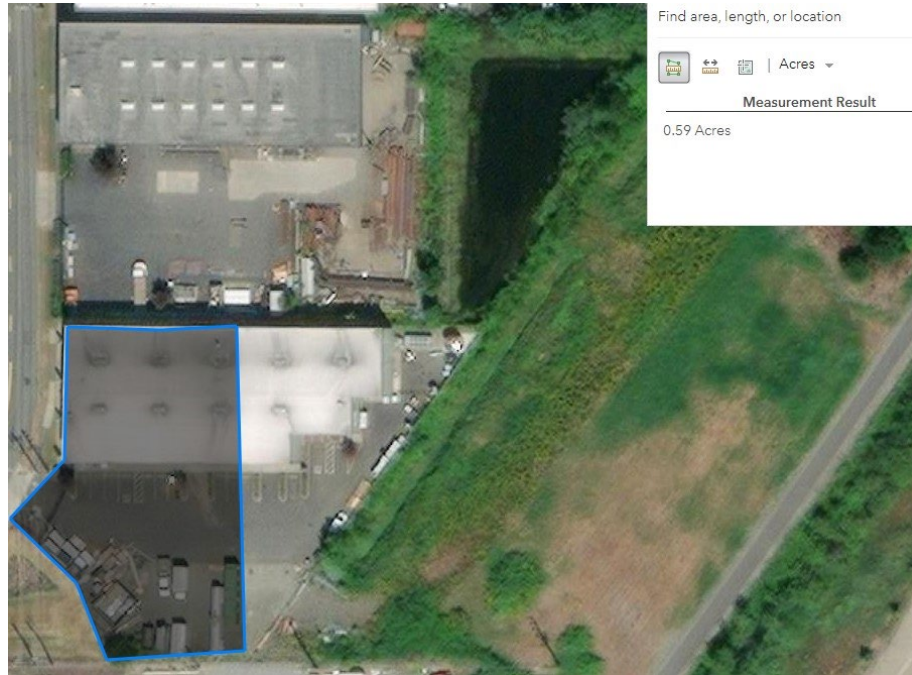
During the inspection, Mr. Thomas confirmed the Facility does not sample stormwater discharges.

## **X. Closing Conference**

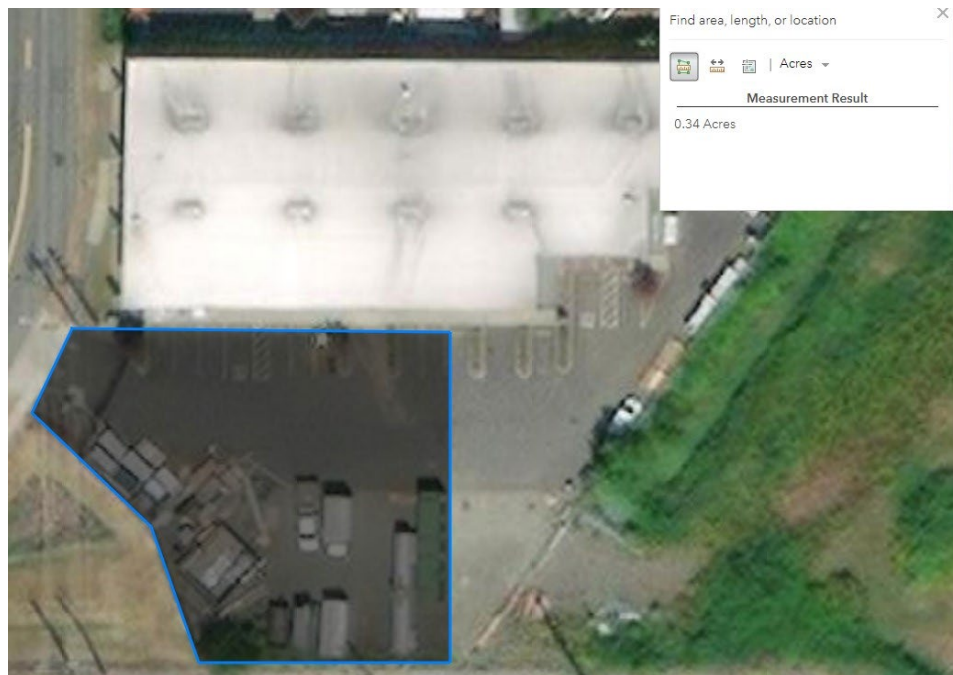
After completing the site tour, I held a brief closing conference with Mr. Thomas. I discussed my observations and areas of concern with him. I then thanked him for his time and cooperation with the inspection.

# ATTACHMENT A

## Satellite Imagery



*Figure 1: White River Fabrication highlighted by blue polygon. They share the building they occupy with a distillery. Note stormwater pond to northeast.*



*Figure 2: GIS imagery of the portion of the White River Fabrication Facility exposed to rainwater, approximately 0.34 acres.*

# ATTACHMENT B

## City of Enumclaw Comprehensive Stormwater Plan Imagery

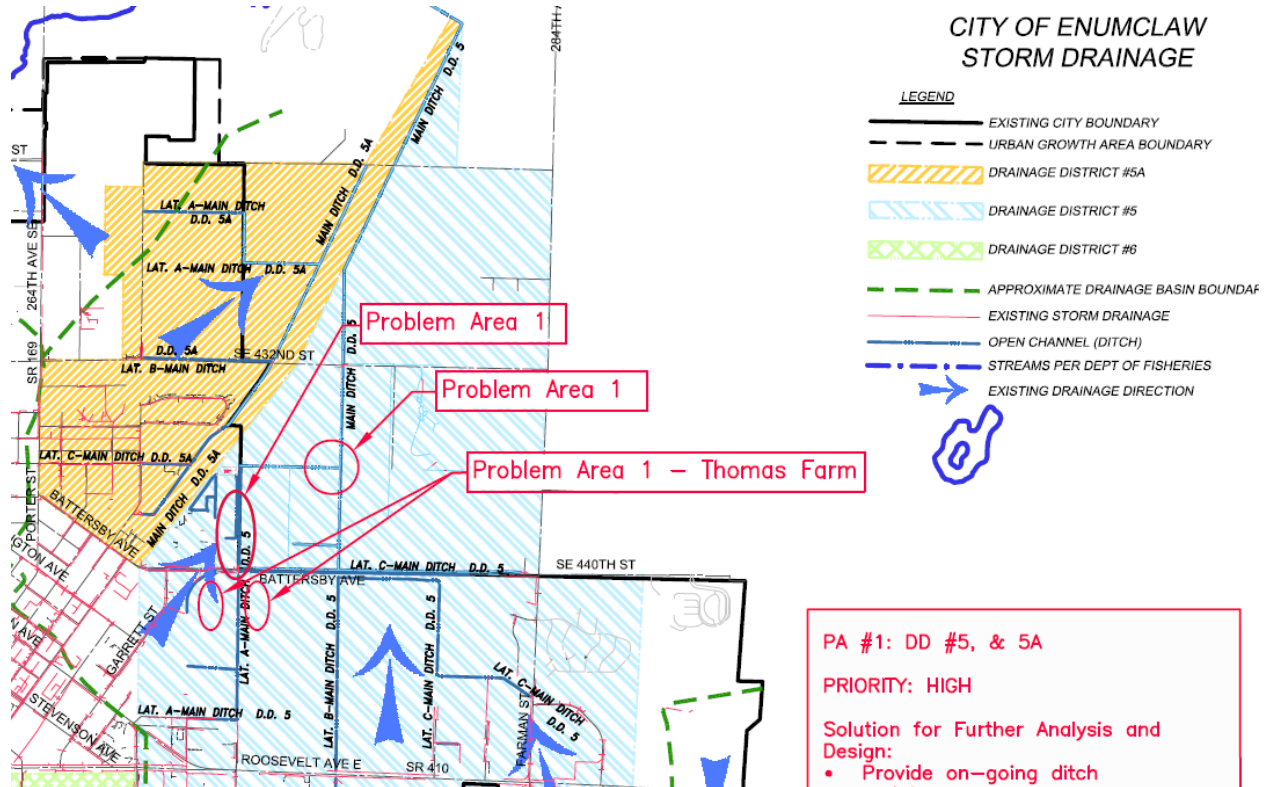


Figure 3: Image from pdf pg. 164 of city's Comprehensive Stormwater Plan. Stormwater from the Facility flows northeast, then north through Drainage District 5A and to the Newaukum Creek.

# ATTACHMENT C

## Photograph Log

All photographs taken by Kyle Masters on May 12, 2023

Nikon Coolpix AW120

### Photo Log – White River Fabrication



Photo #: 01 (DSCN0605)

Description: Facing south, photo of an open bin holding various scrap metal pieces, with additional materials on the ground next to it.



Photo #:02 (DSCN0606)

Description: Facing southeast, overview photo of product storage outside



Photo #: 3 (DSCN0617)

Description: The northern exterior of the Facility with a white pipe extruding. We observed water flowing out of the pipe.

Note, this photo was taken during a subsequent inspection of another facility.