



NPDES Compliance Inspection Report

Parker Hannifin – Enumclaw

**NPDES Permit Tracking Number
WAR004622**

Inspection Date: 01/18/2023

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:

JONATHAN MASTERS	Digitally signed by JONATHAN MASTERS Date: 2023.04.24 13:42:58 -07'00'
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Supervisor Signature/Date:

MICHELE JENCIUS	Digitally signed by MICHELE JENCIUS Date: 2023.04.24 13:51:58 -07'00'
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I. Facility Information

Facility Name: Parker Hannifin – Enumclaw (formerly Helac Corp.)

Facility Owner: Parker Hannifin Corp.

Facility Address: 225 Battersby Avenue
Enumclaw, Washington 98022

Mailing Address: 225 Battersby Avenue
Enumclaw, Washington 98022-8204

Facility Contact(s): Josh Myron, EHS Business Partner
Parker Hannifin – Enumclaw
(253) 247-1728
joshua.myron@parker.com

Charles Clark, Manufacturing Engineer Manager
Parker Hannifin – Enumclaw
(360) 226-3523
charles.clark@parker.com

Latitude/Longitude: N 47.207620 W -121.981600

NPDES Tracking Number: WAR004622

NAICS Code(s): 33399503

Facility Size: Approx. 19.4 acres, with the main building 3.35 acres

II. Inspection Information

Inspection Date: January 18, 2023

Inspector(s): Kyle Masters, Inspector
EPA Region 10, ECAD / SWES

Matt Quarterman, Inspector
EPA Region 10, ECAD / LES

Arrival Time: 9:25 AM

Departure Time: 12:25 PM

Weather: Raining

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.

[Unless otherwise noted, all details in this inspection report were obtained from conversations with Facility representatives, or from observations made during the inspection. The stormwater component of the inspection began at approx. 11:05 AM. Inspector Quarterman and I accompanied each throughout our relative portions of the inspection.]

III. Permit Information

Parker Hannifin – Enumclaw (“Facility”) possesses coverage under the State of Washington Department of Ecology’s Industrial Stormwater General Permit (ISGP, or “Permit”). The Facility first acquired permit coverage on September 20, 2002, with permit coverage since then. The Facility’s current permit tracking number is WAR004622. The current version of the ISGP became effective on January 1, 2020 and expires on December 31, 2024. The Facility submitted their latest Notice of Intent for permit coverage in July 2019. The previous Ecology inspection of the Facility occurred on October 26, 2017.¹

The Facility applied for a state waste discharge permit from Ecology to discharge waste process water to the City of Enumclaw’s publicly owned treatment works in December 2015. Ecology denied the permit application in 2017. Ecology drafted a Fact Sheet for the permit, and noted the original permit applicant, Helac Corp. was acquired by Parker Hannifin on February 1, 2017.

Table 2 of the ISGP, at Section S5.A, lists the benchmarks and sampling requirements all facilities must follow. Table 3, at Section S5.B., requires facilities engaged in machinery manufacturing (NAICS 333xxx) to sample and follow the additional benchmark monitoring program for Lead and Petroleum Hydrocarbons (Diesel Fraction).

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

¹ Information detailing the Facility’s permit history and discharge monitoring reports found at Ecology’s [PARIS database](#).

Table 3: Additional Benchmarks and Sampling Requirements to Specific Industries

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

IV. Facility Background

Parker Hannifin – Enumclaw manufactures hydraulic rotary actuators used by large machinery across multiple industrial segments such as construction, silviculture, mining, agriculture, and marine. They sell their product internationally. The Facility receives raw materials and performs machining, assembly, painting and testing on-site before shipping the finished product off-site. Actuator production and handling constitutes nearly all the industrial activity at the Facility.

Business hours are Monday through Friday, 5 AM – 2:30 PM (5 AM – 5 PM on Fri.), with an additional shift on Saturday. The Facility employees approximately 250 staff, Facility representatives told us.

V. Inspection Chronology

This was an unannounced inspection. Upon arriving on-site, Inspector Quarterman and I entered the front door. We found a small room with a tablet in it and instructions to sign-in. In addition to a sign-in creating a record of our presence, we noted the software on the tablet led to a version of a non-disclosure agreement that asked us to sign it. We decided not to complete the sign-in process and left the building. I called Mr. Charles Clark and explained our plan to conduct an inspection of the Facility. Mr. Clark and Mr. Myron met us at the entrance, we showed them our inspector credentials, and we proceeded to a conference room for our opening conference.

The inspection consisted of an opening conference, a walk-through of the Facility to determine compliance with the Washington state Dangerous Waste Regulations, a tour of the areas outside the main Facility, and ended with a closing conference. We were accompanied throughout the inspection by Mr. Clark and Mr. Myron. Mr. Matt Brannon, Business Unit Manager, participated in most of the inspection as well.

VI. Opening Conference

We held the opening conference shortly after our arrival. We introduced ourselves to Mr. Clark and Mr. Myron and explained Inspector Quarterman and I were conducting inspections in the area. We then discussed the purpose and scope of the inspection. Inspector Quarterman said he would lead the hazardous waste component of the inspection, and I stated I would lead the

industrial stormwater component afterwards.

During the opening conference Mr. Clark provided a brief overview of activities at the Facility. Inspector Quarterman asked several questions related to their waste generation and waste stream management practices. Mr. Clark and Mr. Myron then told us the Facility's operating hours and number of staff. Mr. Clark told us he started working at the Facility in January 2022, and Mr. Myron started at the Facility in June 2022. Mr. Myron confirmed he took over the stormwater management then, and confirmed his duties include submitting the Facility's Discharge Monitoring Reports (DMRs).

We discussed the PPE necessary to conduct the inspection. Steel toe boots, hearing protection, foam-lined safety glasses, and a bump caps or hard hat were required on the production floor. Inspector Quarterman and I went to our car to retrieve our hard hats. When we reentered the Facility, we met Mr. Brannon and Ms. Corinna Brown, Human Resources Manager. We restated the scope of our inspection and proceeded to the production floor. After completing a walk through of the interior of the Facility we moved outside, and I led the stormwater component of the inspection.

VII. Site Review

We began just outside the main entrance and moved north to the shipping area. We saw many new pallets and blocking and bracing material stored outside (**Photo 1**). In the same area we saw a pallet of recently delivered garnet material used inside the Facility in their abrasive process.

We moved northeast and saw two approximately 10-foot-long storage lockers. The Facility stores a variety of paints and coatings and other flammable materials inside the lockers (**Photos 2 and 3**). Inside the lockers we saw a metal grate types of floor with built in secondary containment capable of holding liquid in the event of a spill. In addition to some dry materials, like packing materials and paint mixing supplies, we also saw some spill kit supplies stored in the lockers. Nearby we saw a catch basin. Mr. Myron told us stormwater from this part of the Facility flows generally east to a swale, which then conveys the water their on-site retention pond.

Northeast of the lockers we saw four large industrial machines, three excavators and a front-end loader, stored on pervious land (**Photo 4**). Mr. Clark told us they keep these machines on-site to test new actuators. Just north of the lockers we saw five red dumpsters holding mostly scrap metal for recycling, and east of those, approximately 12 bales of compressed cardboard and paper (**Photo 5**). We observed the dumpsters labeled "Seattle Iron and Metals Corp." Three smaller dumpsters, approximately four feet wide sat closed, though the two longer dumpsters, approximately 10-12 feet long, sat open. I looked inside the southernmost open dumpster and saw a small accumulation of water freely draining through an open seam on the bottom of the dumpster (**Photo 6**). To the west of the smaller dumpsters, we saw some metal shavings and fines on the ground (**Photo 7**). Mr. Clark told us they accumulate steel in the larger dumpsters, and the smaller ones usually hold more valuable metals. He said he thought the observed fines looked to be brass.

Next to the red dumpsters we saw nine shipping containers used as additional material storage (**Photo 8**). To the west we saw the Facility's receiving area. We noted the spill kit and wheel chocks (**Photo 9**). To the north we saw a catch basin at the boundary of the graveled, impervious, portion of the Facility, and separated by a curb, the undeveloped adjoining land. Mr. Myron told us the impervious surfaces served as an accurate marker of land owned by the Facility, and the pervious, vegetated and undeveloped land, is leased. We saw surface water carrying sediment and small rocks flowing into the catch basin, which did not appear to have a filter installed to screen the sediment (**Photo 10**). Mr. Myron said stormwater would flow west, then northeast, to the retention pond.

We proceeded around the north of the Facility. We saw another open, green dumpster, approximately 15 feet long (**Photo 11**). In the same area we saw additional metal bins and wheeled carts, some holding various smaller plastic bins (**Photo 12**). At the northwest corner of the Facility, we saw approximately two dozen compressed gas cylinders stored outside (**Photo 13**). Additionally, we saw an approximately 250-gallon plastic tank. The tank's bottom bung looked capped, and it had a cover over it, though it also had a hole cut into the top that appeared uncovered (**Photo 14**). The tank appeared to hold an accumulation of water mixed with an unknown substance. Mr. Myron and Clark said they were unsure about the tank's history. Next to it we saw a secondary power generator.

Nearby, to the west, we saw catch basin holding water with bubbles, possibly from a surfactant or an additional source (**Photo 15**). The Facility representatives stated they did not know the source of the bubbling. We continued south noting additional catch basins (**Photo 16**), and where the ring of perimeter catch basins ended, a large pooling of water (**Photo 17**). It appeared the neighboring property had been built up with rock, and water accumulated along the property line, or flowed just into property owned by the Facility.

I walked farther south along the property line and observed the pooling appeared isolated to the area in Photo 17 (**Photos 18, 19**). I saw a catch basin along Battersby Avenue, outside the Facility's fence-line; Mr. Myron indicated it did not belong to the Facility (**Photo 20**). The pooling did not appear to flow in the direction of this catch basin (**Photo 21**).

We walked across the southern perimeter to a catch basin at the southwest corner of land leased by the Facility, also by Battersby Avenue (**Photo 22**). Mr. Myron said he thought this might belong to the City of Enumclaw's municipal separate storm sewer system. Inside the catch basin appeared to be a receiving pipe from the east, and an outfall pipe to the north (**Photo 23**). North of the catch basin, we saw the apparent discharge point from the catch basin (**Photo 24**). We observed water to the north of this point, possibly infiltrating as we did not see an apparent flow (**Photo 25**).

We continued north along the eastern edge of the leased land. We saw a berm separating the land from the Drainage District 5 lateral (lateral, **Photo 28, 35**). We also saw a cut in the berm with a rock check dam (**Photo 26**).

Note: The site in **Photo 26** generally corresponds with the "Emergency Overflow" identified in the Facility's site map. Facility representatives did not describe it as such.

As we continued north, we saw the surface water flow rather than stand (**Photo 27**). Along the property edge we saw the beginning of a swale collecting the flowing water (**Photo 29, 30**). Mr. Myron stated this was one of three swales on the leased land directing stormwater to their retention pond.

Farther north we saw some debris in the swale (**Photo 31, 33**). We noted the flow in the swale increased as we went north (**Photo 32**), in part due to the swale collecting additional flow across the land (**Photo 34**). Mr. Myron showed me a map that showed the direction of water flowing across the site. He stated the map is part of the Facility's Stormwater Pollution Prevention Plan (SWPPP).

As we approached the Facility's pond, we saw signs of temporary human habitation (**Photo 36**). Mr. Clark said they had occasionally cleaned up the area and found large amounts of solid waste left behind. He also said he was aware of a historic spill record which may have led to a life die-off in and around the pond. He said he thought the spill stemmed from chemical waste left behind by trespassers.

We crossed an older wooden bridge, with another swale flowing into the pond under the bridge (**Photo 37, 38**). We observed the stormwater pond and saw a corrugated metal pipe in the northeast corner of the pond (**Photo 39, 40**). Next to the pond we saw a Type 2 catch basin that Mr. Myron said would be their sample point in the event of a discharge. He and Mr. Clark reiterated they do not believe the stormwater has discharged from the Facility's retention pond. Mr. Myron pulled the lid from the catch basin, and he and Mr. Clark showed the corrugated pipe connecting inside the catch basin, and feeding water into a stand pipe (**Photo 41**). Mr. Clark said the water would need to rise several feet inside the catch basin before it would flow fully up the stand pipe, and discharge into the near-by lateral.

I went over to the berm next to the lateral and I saw a white pipe actively discharging water into the lateral (**Photo 42, 43**). Mr. Myron and Mr. Clark said they did not know the source of the discharge. I pointed out the pipe was directly opposite their on-site retention pond, and there did not appear to be any other dischargers in the area. I asked if they knew of any other source discharging either into their pond, or across the Facility's leased land. They said they did not. Mr. Myron did show me another pipe, apparently made of concrete, that he said they thought served as the discharge point for water from the pond into the lateral (**Photo 44**). The pipe appeared in poor repair, and cracked further while Mr. Myron examined it. We left the pond heading back to the Facility, and I saw the third swale conveying stormwater to the Facility's pond (**Photo 45**).

VIII. File Review

I asked Mr. Myron if he currently had a printed out copy of the SWPPP after the Facility walk-through. He said he did not, aside from the Site Map he showed us during the inspection. I told him I would send an email with my records request after the inspection. At the time, Mr. Myron did not express any concern with this, or that there would be a lengthy review process prior to sending me those records.

On January 19, I emailed Mr Myron and requested the following records by January 24:

- The Facility's SWPPP, including the site map he showed me during the inspection.
- Annual reports for 2018-2021.
- Permit coverage letter with any amendments or transfers of coverage since the current permit took effect.
- Sampling records and DMRs with any actual sample results, i.e., not simply saying "no discharge."
- Site inspection reports since 2018.

On January 24, Mr. Myron emailed me back and stated he was still compiling the requested records. Mr. Myron sent me these records on February 28:

- SWPPP.
- Annual reports for 2019, 2020, and 2021.
- Permit coverage letter for the Facility, dated December 30, 2019.
- A letter from Mr. Myron explaining he could not find a 2018 Annual Report, or site inspection reports. He also stated he had no DMRs that did not record "no discharge," though he indicated the sampled a discharge that day.

I emailed Mr. Myron that day and asked for the lab report when he received it. He sent it to me March 2.

IX. Areas of Concern

Observations during the inspection, and follow-up records review, identified the following areas of concern.

A. Record Availability

Section S9.D.3. of the Permit states, "The Permittee shall make all plans, documents, and records required by this permit immediately available to Ecology or the local jurisdiction upon request; or within 14 days of a written request from Ecology."

1. During the inspection's closing conference, I verbally informed Mr. Myron I requested to review the Facility's SWPPP, annual reports, monthly site inspection reports, sampling records and DMRs recording actual discharges, and permit coverage letter. On January 19, I emailed my records request to Mr. Myron. The Facility did not send me the requested documents until February 28.

B. 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) ...”*

2. As noted above, since 2020 the Facility recorded “no discharge” on their DMRs. However, during the inspection, we saw water discharging from a pipe next to the on-site retention pond into the Drainage District 5 lateral (**Photos 42, 43**). Mr. Myron stated in a March 2, 2023, email the Facility sampled its discharge on February 28.

3. In the March 2 email, Mr. Myron also shared the sampling results with me. The report from Fremont Analytical, of Seattle, Washington, was also dated March 2, 2023. I note the following:

- The report lists the pH result at 6.88, with the time of analysis at 5:10 PM on February 28 by analyst, “AM.” The report also states the method used as SM 4500H+B, and the report states the lab received the sample on February 28, and the lab performed the analyses presented in the report, including pH. Table 2 of the Permit requires permittees to test pH using an on-site meter or paper. EPA requires permittees to test pH, “immediately,” which is understood within 15 minutes of sampling. Note, the holding time listed for method 4500-H+B is 0.25 hours.

C. Facility Inspections

Section S7.A.1. *of the Permit states, “The Permittee shall conduct and document visual inspections of the site each month.”*

Section S7.C.1. *of the Permit states, “The Permittee shall record the results of each inspection in an inspection report or checklist and keep the records on-site...The Permittee shall ensure each inspection report documents the observations, verifications and assessments required...”*

4. Mr. Myron told me on February 28, 2023, the Facility could not locate any monthly site inspection reports dating back to at least February 2018.

D. Annual Reports

Section S9.C.1. *of the Permit states, “The Permittee shall submit a complete and accurate Annual Report to the Department of Ecology no later than May 15th of each year...”*

5. Mr. Myron told me on February 28, 2023, the Facility could not find a copy of the 2018 annual report.

6. The Facility signed the 2020 annual report on August 9, 2021 and submitted it late.

7. The Facility signed the 2021 annual report on January 11, 2023 and submitted it late.

E. Discharge General Prohibitions

Section S5.F.2. of the Permit states, “Permittees shall manage stormwater to prevent the discharge of...Trash and floating debris.”

8. During the inspection we saw floating trash in a swale channeling stormwater to the Facility’s retention pond (**Photo 31**).

F. Discharge Monitoring Reports

Section S9.B. of the Permit states, “The Permittee shall submit sampling data obtained during each reporting period on a Discharge Monitoring Report (DMR)...the Permittee shall ensure that DMRs are submitted to Ecology by...”

9. The Facility submitted 11 of the most recent 12 DMRs late. I reviewed Discharge Monitoring Reports (DMRs) going back to 2020 and summarize the dates:

Discharge Monitoring Reports since 2020			
QUARTER	DUE DATE	SUBMITTED	RESULTS REPORTED
Q1 2020	5/15/20	4/14/21	No Discharge
Q2 2020	8/15/20	4/14/21	No Discharge
Q3 2020	11/15/20	4/14/21	No Discharge
Q4 2020	2/15/21	4/14/21	No Discharge
Q1 2021	5/15/21	9/14/21	No Discharge
Q2 2021	8/15/21	9/14/21	No Discharge
Q3 2021	11/15/21	9/14/21	No Discharge
Q4 2021	2/15/22	8/16/22	No Discharge
Q1 2022	5/15/22	8/16/22	No Discharge
Q2 2022	8/15/22	8/16/22	No Discharge
Q3 2022	11/15/22	12/14/22	No Discharge
Q4 2022	2/15/23	3/3/23	Analysis Not Conducted

G. Stormwater Pollution Prevention Plan (SWPPP)

Section S3.A.5. of the Permit states, “The Permittee shall sign and certify all SWPPPs in accordance with General Condition G2...”

10. The SWPPP submitted by the Facility on February 28 lacked a signed certification from the Permittee.

Section S3.B.1. of the Permit states, “The site map shall identify...”

Section S3.B.1.f. of the Permit states, “Locations of all receiving water (including wetlands and drainage ditches) in the immediate vicinity of the facility.”

Section S3.B.1.m. of the Permit states, “Locations of stormwater inlets and outfalls with a unique identification number for each sampling point and discharge point...and identify, by name, any other party other than the Permittee that owns any stormwater

drainage or discharge structures.”

11. The site map in the Facility’s SWPPP fails to identify all receiving waters, including drainage ditches, in the immediate vicinity of the Facility.

12. The site map identifies two spots as “SP001” and “SP002,” however it does not define those terms, nor does the map show the discharge point.

13. Mr. Myron stated he thought stormwater flowed from Battersby Avenue through the catch basin and pipe shown in **Photos 22-24**, onto land leased by the Facility. However, the site map does not label with a unique identification number this potential inlet. The site map also doesn’t name which party may own the pictured stormwater drainage or discharge structures.

14. Mr. Myron stated he thought the pipe in **Photo 44** would convey the Facility’s stormwater discharge. He said he was unsure of the source of the discharge seen in **Photos 42 and 43**. The site map does not give a unique identification number to either point, nor identify what other party may own the drainage or discharge structure.

***Section S3.B.3.** of the Permit states, “The SWPPP shall identify specific individuals by name or by title within the organization (pollution prevention team) whose responsibilities include: SWPPP development, implementation, maintenance, and modification.”*

15. Neither Mr. Myron, Mr. Clark, Mr. Brannon, or Ms. Brown are identified in the SWPPP as member of the pollution prevention team. Further, we did not meet any of the individuals listed. During the inspection, Mr. Myron indicated some experienced employees left the company within the past two years.

***Section S3.B.4.b.i.2.** of the Permit states, “The SWPPP shall include BMPs that define ongoing maintenance and cleanup, as appropriate, of areas which may contribute pollutants to stormwater discharges. The SWPPP shall include the schedule/frequency for completing each housekeeping task...The Permittee shall...vacuum paved surfaces...Keep all dumpsters under cover or fit with a storm resistant lid that must remain closed when not in use.*

***Section S3.B.4.b.v.** of the Permit states, “The SWPPP shall include BMPs necessary to prevent the erosion of soils and other earthen materials...”*

16. Section 4.1.1.1 of the SWPPP states the facility sweeps paved areas regularly and as needed. Section 4.5 of the SWPPP states the Facility’s catch basins contain filter inserts assist in sediment control. We observed an excess of sediment built up over a catch basin (**Photo 10**), and a significant amount of brass fines on the ground (**Photo 7**). No catch basin filters were apparent during our inspection.

17. We noted three large, approximately 12-15-foot-long dumpsters, open during the inspection (**Photos 5 and 11**).

Section S3.B.5. of the Permit states, “The SWPPP shall include a sampling plan. The plan shall...identify points of discharge to surface water, storm sewers, or discrete groundwater infiltration locations such as dry wells or detention ponds.”

18. The SWPPP’s sampling plan fails to identify points of discharge to surface water.

X. Closing Conference

After we completed the site tour, we held a brief closing conference with Mr. Myron, Mr. Clark, Mr. Brannon, and Ms. Brown. I reiterated I would send a records request through email after the inspection. I discussed my observations and areas of concern with him, including the open dumpsters, brass fines on the ground, sediment flowing into the catch basin, and the apparent ongoing discharge from the stormwater pond without a sampling record. I then thanked the Facility representatives for their time and cooperation with the inspection.

ATTACHMENT A

Satellite Imagery



Figure 1: GIS Imagery showing the building's footprint at approximately 3.35 acres.

ATTACHMENT B

City of Enumclaw Comprehensive Stormwater Plan Imagery

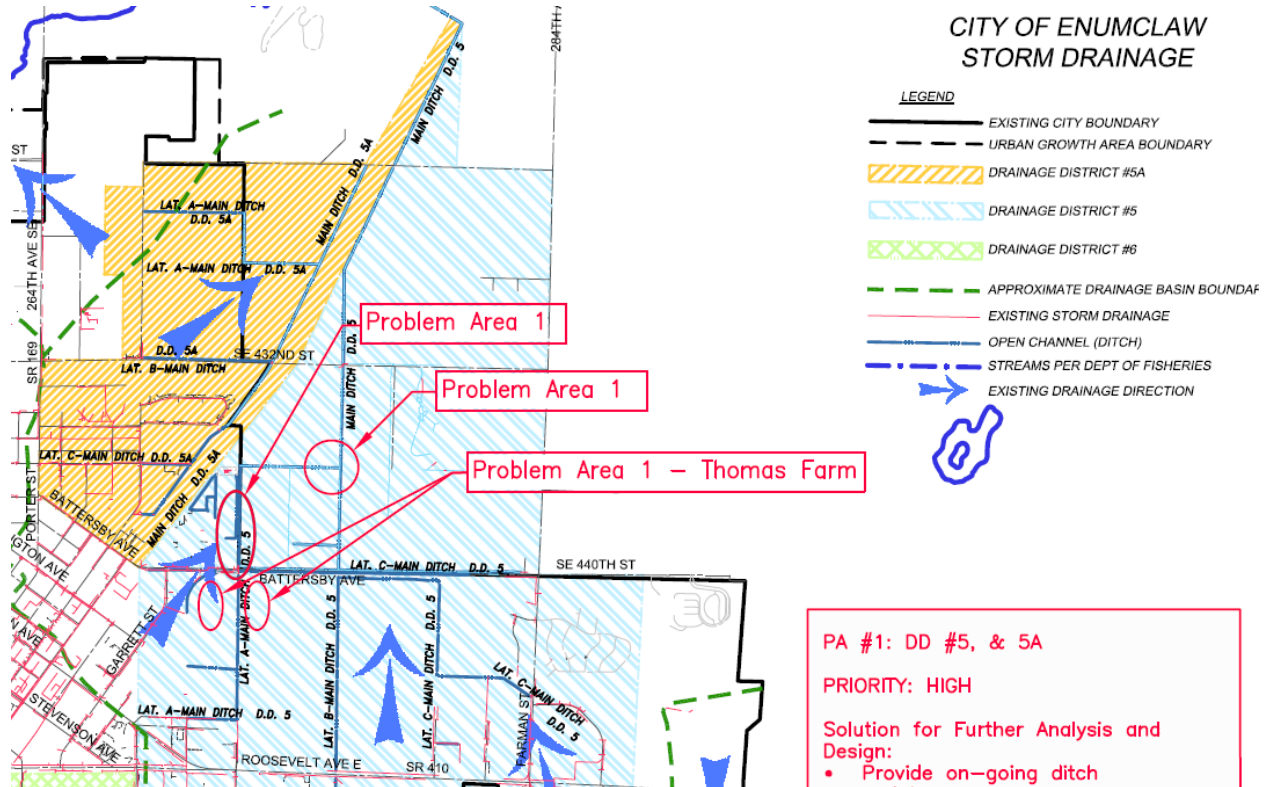


Figure 3: Image from pdf pg. 164 of city's Comprehensive Stormwater Plan. Stormwater from the Facility flows east and north, then north through Drainage District 5 to the Newaukum Creek.

ATTACHMENT C

Photograph Log

All photographs taken by Kyle Masters on January 18, 2023²

Nikon Coolpix AW120

Photo Log – Parker Hannifin – Enumclaw



Photo: #01 (DSCN0458.JPG)

Description: Facing east, an overview of the outside of the shipping department showing a mix of old and new pallets.



Photo: #02 (DSCN0459.JPG)

Description: Facing east, the inside of one of two outdoor storage containers holding product paints.

² Time stamp in all photos is one hour later than actual time.



Photo: #03 (DSCN0460.JPG)
Description: Facing east, the inside of the second outdoor storage container holding products.



Photo: #04 (DSCN0461.JPG)
Description: Facing east, four large earthmoving pieces of equipment stored on-site to test new products manufactured at the Facility.



Photo: #05 (DSCN0462.JPG)
Description: Facing north, standing due east of the Facility, three large dumpster holding scrap metal stand open. To the right, bales of paper stored outside.



Photo: #06 (DSC0463.JPG)
Description: Interior of rightmost dumpster in Photo 5, showing steel scrap and fines, with an open seam at the bottom. Beneath the dumpster appeared rust colored water (pool visible in Photo 5).



Photo: #07 (DSCN0464.JPG)

Description: Facing northeast, backside of smaller dumpsters visible on the left of Photo 5; with large accumulation of brass fines on the ground.



Photo: #08 (DSCN0465.JPG)

Description: Facing east, large impervious concrete pad holding nine shipping containers used to store products.



Photo: #09 (DSCN0466.JPG)

Description: Facing west, photo of spill kit outside Receiving Department. Spill kit is due west of containers in Photo 8.



Photo: #10 (DSC0467.JPG)

Description: Facing east, just north of containers in Photo 8, graveled area meets pervious grassland, with a perimeter of catch basins catching stormwater run-off from impervious area.



Photo: #11 (DSCN0468.JPG)

Description: Facing south, and the northern side of the Facility, a large dumpster holding wood debris stood open. Also visible, metal bins and wheeled carts.



Photo: #12 (DSCN0469.JPG)

Description: Facing south, west of Photo 11, additional bins holding plastic trays.



Photo: #13 (DSCN0470.JPG)

Description: Facing southeast, photo of northwest corner of Facility, showing many compressed gas cylinders stored outside.



Photo: #14 (DSC0516)

Description: Facing south, one capped tank standing west of cylinders in photo 13, and a secondary generator. The tank has a secondary lid strapped on, but the cut hole appeared only part covered, and the tank appeared to hold a water mixture.

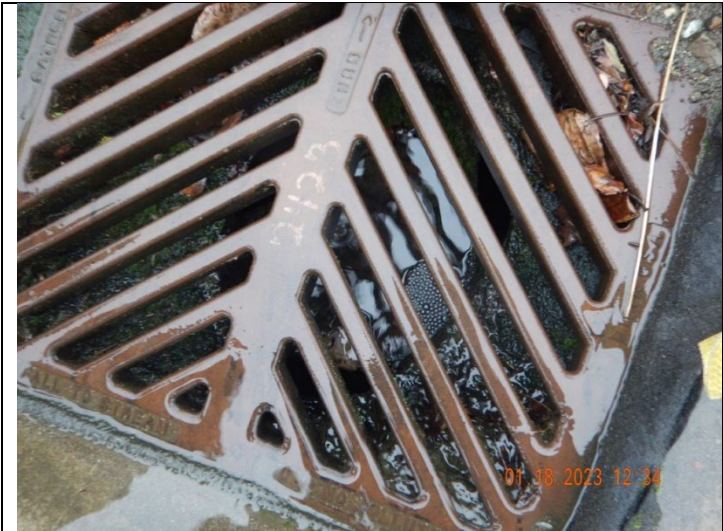


Photo: #15 (DSC0472.JPG)

Description: Another of the series of catch basins circling the perimeter of the Facility. Water inside bubbled, possibly indicating the presence of a surfactant.



Photo: #16 (DSC0473.JPG)

Description: Vicinity of preceding catch basin. Area beyond the catch basin and curbed boundary of the Facility belongs to neighboring Facility.

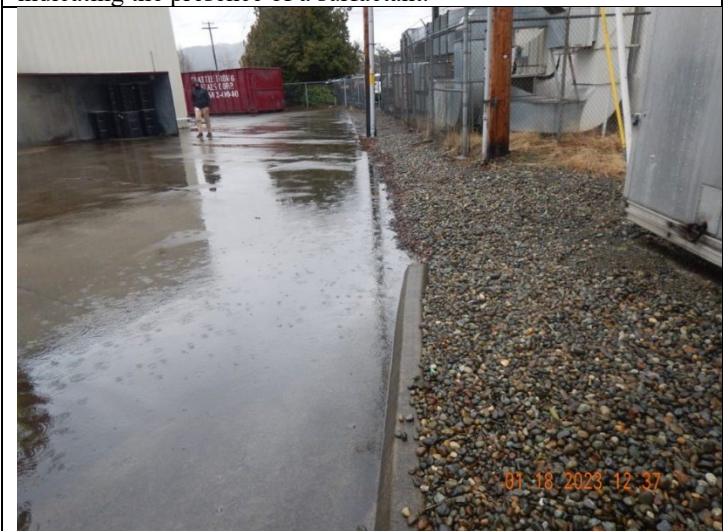


Photo: #17 (DSC0474.JPG)

Description: Facing south, apparent pooling along edge of property. Boundary between properties appeared built-up with rocky aggregate.



Photo: #18 (DSC0475.JPG)

Description: Facing south, at the fence-line visible in background of Photo 17. The boundary between properties continues to appear built-up with an aggregate mixture.



Photo: #19 (DSC0476.JPG)
Description: Facing north, turned opposite from vantage in Photo 18, pooling water in previous photos does not appear flowing towards the street.



Photo: #20 (DSC0477.JPG)
Description: Facing south, catch basin next to Battersby Avenue, located on neighboring property, did not appear to receive stormwater flow.



Photo: #21 (DSC0478.JPG)
Description: Facing north, opposite vantage from Photo 21.



Photo: #22 (DSC0479.JPG)
Description: Facing west along Battersby Avenue, looking towards the Facility. Image shows a catch basin along the right of way.



Photo: #23 (DSC0480.JPG)
 Description: Close-up of catch basin in Photo 22. We noted a pipe leading north from the catch basin back to land owned by the Facility.



Photo: #24 (DSC0481.JPG)
 Description: Facing south, with Battersby Avenue in background. Exposed pipe appears to serve as discharge point from the catch basin in Photo 22. Land around pipe appeared slightly lower in elevation, and we saw some standing water.



Photo: #25 (DSCN0482.JPG)
 Description: Facing north from vantage in Photo 24, photo shows the lands east of the Facility, which they lease.



Photo: #26 (DSCN0483.JPG)
 Description: Facing east, north of Photo 25 photo shows raised dike separating lands leased by Facility from the Drainage District 5 lateral.



Photo: #27 (DSCN0484.JPG)
 Description: Surface water flowing north across lands leased by Facility. Water appeared to flow in small channel.



Photo: #28 (DSCN0485.JPG)
 Description: Facing east, photo shows lateral of Drainage District 5 flowing north from Battersby Avenue.



Photo: #29 (DSCN0486.JPG)
 Description: Facing south, image of channel carrying surface water north across lands leased by the Facility.



Photo: #30 (DSCN0487.JPG)
 Description: Facing west towards Facility. Image of channel, and apparent rock dam, carrying surface water generally east and north across lands leased by the Facility.



Photo: #31 (DSCN0488.JPG)

Description: Photo of surface water in channel, with some floating trash, flowing generally east and north across lands leased by the Facility.



Photo: #32 (DSCN0489.JPG)

Description: Photo of surface water in channel flowing generally east and north across lands leased by the Facility. Vantage of photo is north from Photos 29-31.



Photo: #33 (DSCN0490.JPG)

Description: Photo of surface water in a swale flowing generally north across lands leased by the Facility, with large piece of metal debris.



Photo: #34 (DSCN0491.JPG)

Description: Photo of surface water in channel flowing east from the facility to larger channel flowing northwards on lands leased by the Facility.



Photo: #35 (DSCN0492.JPG)

Description: Facing northeast, standing on the berm separating the leased lands, image shows Drainage District 5 lateral flowing north.



Photo: #36 (DSCN0493.JPG)

Description: Facing south, sign of temporary human occupancy on lands leased by the Facility. Site of photo just south of Facility's stormwater pond.



Photo: #37 (DSCN0494.JPG)

Description: Water flowing north from lands leased by the Facility towards stormwater pond. Constructed wood in foreground is part of bridge crossing the swale as it flows into the pond.



Photo: #38 (DSCN0495.JPG)

Description: Facing south, with Facility in background, image shows another swale capable of conveying water into stormwater pond.



Photo: #39 (DSCN0496.JPG)
Description: Facing northeast, image of Facility's on-site stormwater retention pond with an outfall pipe in background.



Photo: #40 (DSCN0497.JPG)
Description: Close-up of pipe in background of Photo 39. Pond's water level crosses threshold of pipe's lower lip. The pipe appeared to slant up, above stormwater pond level.



Photo: #41 (DSCN0498.JPG)
Description: Interior view of a Type 2 catch basin situated between stormwater pond and drainage district lateral. Facility representatives referred to this as a stand pipe assembly; waters flow from pond through pipe (right) and would flow up through metal assembly (left) before discharging. Representatives stated they would sample here in the event the basin filled.



Photo: #42 (DSCN0499.JPG)
Description: Image of pipe with water discharging into Drainage District 5 lateral. This outfall sat directly between Facility's stormwater pond and the lateral. Pipe appeared made from PVC or a similar material.



Photo: #43 (DSCN0500.JPG)

Description: Zoomed out image of pipe from Photo 44. Pipe appeared to cross from Facility stormwater pond, through the berm, to the lateral.



Photo: #44 (DSCN0501.JPG)

Description: Second pipe leading to the lateral. This pipe appeared constructed of concrete, or similar material. Facility representatives stated they believed this pipe served as their pond's discharge point. Interior of the pipe appeared dry, though the case had cracked.



Photo: #45 (DSCN0502.JPG)

Description: Facing north, back towards Facility stormwater pond. Images shows another swale of water flowing across lands leased by the Facility.