City of Seattle
Gregory J. Nickels, Mayor

Seattle Public Utilities
Chuck Clarke, Director

June 17, 2008

Independent Metals Co.
Attn: Mick O'Farrell
747 S Monroe St
Seattle, WA 98106

Subject: Results from the Environmental Compliance Inspection: **Corrective action required.**

Dear Mick O'Farrell:

Thank you for your cooperation during the inspection that was conducted at your facility at 747 S Monroe St. Inspections of commercial and industrial properties are being conducted as part of a King County and Seattle Public Utilities (SPU) joint program to assist businesses in reducing the amount of pollutants discharged to the Duwamish waterway via storm drains and combined sewer overflows. SPU is also inspecting businesses to ensure that they are in compliance with the City's Stormwater, Grading, and Drainage Code (SMC 22.800).

During the inspection several items were identified that must be addressed under SPU's stormwater pollution prevention program. It is your responsibility to comply with the City code. If compliance is not achieved in a timely manner enforcement actions may be taken. The following is the list of corrective actions we discussed during the inspection:

Spill Management:

- **Please complete a written spill plan and post at appropriate locations at the facility (near the waste storage area or near the phone). Your operation includes one or more of the high-risk pollution generating activities listed in SMC 22.800. Accordingly, you must implement a spill plan. The spill plan should specifically state information on how to handle an emergency situation, including who to call and what actions to take. I have included a spill plan template with this letter.**

- **Please obtain a drain cover and put spill materials in an easily accessible location, clearly marked "Spill Kit." Use the drain cover to during spills to protect the drain.**

- **Please educate your employees about the spill plan and spill kit. This is the most important step of the spill plan. Please provide documentation of your employee training.**

- **Use absorbent pads, granular sorbent or rags to clean up leaks and spills as they occur. At the time of my visit, there were spills and staining in the lot and around the storage containers. Cleaning up leaks and spills as they occur keeps pollutants out of the drainage system and reduces the need for expensive catch basin maintenance. SPU has responded to at least one spill due to activities associated with your business. If future spill responses are necessary, SPU reserves the right to charge Independent Metals for the costs associated with these spill responses if they occur as a result of your business operations.**

Detention/Drainage System Maintenance

- **Please clean the detention system and catch basins at the site. During the inspection, the detention system and drains at the site had residual oil and sediment in the structures. The detention system is not designed to treat stormwater or remove oil or other contaminants from stormwater at your site. Do not discharge contaminants to the drainage system. I have enclosed a list of contractors that would perform this work for you or you can look up contractors in the yellow pages. Keep all maintenance records on file.**

Waste Management

- **Properly store and dispose of wastes including waste oil, antifreeze, batteries, electronics, ballasts, capacitors, and metal chips, and coolant. During the inspection, there were residual liquids on the ground surface at the site in and around storage areas and around the scrap metal pile on the southwest portion of the site. Some of the liquid appeared to be from an oil/coolant mixture associated with scrap metal chips being received by your facility. Other residual liquids appeared to be associated with scrap automobiles and automobile parts. Please segregate metal chips to contain the residual liquids. Store all wastes, including waste liquids, in closed water-tight containers. You mentioned during the inspection that you plan to create a waste storage area under the west side of the building with cover and secondary containment. Please use this area to properly store wastes prior to disposal.**

- **Maintain copies of all receipts and other paperwork given to you by the waste disposal vendor. Receipts track your waste from your site to the hauler and, in some cases, to the receiving facility. Keep your records for at least five years (forever is a good policy). You need to be concerned about these issues because your signature is on the manifests. Your signature identifies you as the person ultimately responsible for the proper disposal of your hazardous wastes.**

- **Storage areas for fuels and hazardous materials should have secondary containment to contain spills and leaks from tipped, overfilled, or ruptured containers. The containment should be able to hold 10 percent of the capacity of all stored containers or 110 percent of the capacity of the largest container, whichever is greatest. Also, keep bungs in drums and caps on containers when you are not dispensing from or filling them to prevent accidental spills and exposure to harmful and flammable vapors.**

- **All waste containers need labels identifying their contents. If the material is hazardous waste it should have a hazardous waste label that identifies its contents, health risks, flammability, reactivity, and required personal protection. Apply labels and position containers so labels are clearly visible.**

If you have any questions or concerns regarding the above identified stormwater pollution prevention corrections, please contact Brian Robinson at (206) 733-9160 or Brian.Robinson@seattle.gov.

I will return to re-inspect your property within 30 days to ensure that the necessary corrections have been completed. SPU wants to assist business owners in bringing their businesses into

compliance voluntarily. However, it is your responsibility to comply with the City code. If compliance is not achieved in a timely manner, a Notice of Violation may be issued that could result in a fine of up to $500 for each day the violation continues.

SPU is working to reduce pollution in our drainage system and local surface waters. Implementing best management practices at your property is the most effective way to prevent pollutants from entering your storm drains, which ultimately discharge into the Duwamish Waterway. With your help we can improve stormwater quality in Seattle.

Sincerely,

Brian Robinson
Environmental Compliance Inspector

Enclosure(s): Spill Plan Template
Drainage Contractor List