



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
INDUSTRIAL STORMWATER
EXPEDITED SETTLEMENT AGREEMENT



Permittee		Site Factors		
Site Name:	Parker Hannifin - Enumclaw (formerly Helac Corp)	Acres of Exposure:	16	
Street Address:	225 Battersby Avenue	Full Time Employees:	250	
City, State, Zip:	98022	Environmental Harm:	Med	
Lat/Long:	N 47.207620 W -121.981600	Sector:	AB - Transportation Equipment, Industrial or Commercial Machinery	
Permit ID:	WAR004622	Receiving Water(s):	Drainage District 5 Lateral - Newaukum Creek	
Inspection Date:	1/18/2023	Water(s) Status:	Medium Quality	
Permit Section Citation		Magnitude*	Penalty Amount	Duration
S3.4	Control Measure Selection and Design Considerations	Minimal	\$1,641	Jan-23
S3.4	Non-Numeric Technology-Based Effluent Limits	Minimal	\$1,641	Jan-23
S7	Routine Facility Inspections	≥ 50%	\$6,563	January 2020- January 2023
S4	General Sampling Requirements	Significant	\$4,922	January 2020- January 2023 (Quarter 1 2020 - Quarter 4 2022)
S5	Benchmark Monitoring	≥ 50%	\$16,406	January 2020- January 2023 (Quarter 1 2020 - Quarter 4 2022)
S6	Impaired Waters Monitoring	≥ 50%	\$19,688	January 2020- January 2023 (Quarter 1 2020 - Quarter 4 2022)
S3	Stormwater Pollution Prevention Plan (SWPPP)	Significant	\$9,844	Jan-23
S9	Reporting and Recordkeeping	Significant	\$3,281	January 2020- February 2024
		Total:	\$63,984	

* "Magnitude" reflects the severity and/or duration of the violations identified by the Inspector(s) at the time of the Inspection.



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Permit Section Citation	Description of Violations
S3.4 Control Measure Selection and Design Considerations	Lack of catch basin filters - EPA observed excess sediment built up over a catch basin
S3.4 Non-Numeric Technology-Based Effluent Limits	EPA noted three large, approximately 12-15-foot-long dumpsters, open during the inspection (Photos 5 and 11 in inspection report); significant amount of brass fines on the ground next to dumpsters (Photo 7 in inspection report)
S7 Routine Facility Inspections	During the inspection, the facility could not locate any monthly site inspection reports dating back to at least February 2018 which would include since January 2020 (ISGP issuance).
S4 General Sampling Requirements	Failure to conduct sampling of stormwater in accordance with the permit (including failure to meet frequency and timing requirements such as fall and annual samples); No DMR submittals since Q1 2023 - further indicative of no sampling being performed. Since 2020 the Facility recorded "no discharge" on their DMRs. However, during the inspection, EPA saw water discharging from a pipe next to the on-site retention pond into the Drainage District 5 lateral that most likely originated from the catch basin with stand pipe for the retention pond and should have been sampled. pH not properly and immediately measured with an on-site meter or paper (within 15 minutes) on site for Quarter 1 2023 monitoring event. Lab analysis report for the 2/28/23 sample taken had a pH result with the analysis method used listing a hold time of 0.25 hours.
S5 Benchmark Monitoring	Failure to conduct benchmark monitoring for more than 50% of the DMRs submitted as "No Discharge" when likely there were stormwater discharges based on NOAA historical daily rain data. Not knowing if corrective actions would have been triggered due to missed monitoring. Floating trash observed in a swale channeling stormwater to the retention pond.
S6 Impaired Waters Monitoring	Failure to conduct impaired monitoring for more than 50% of the DMRs submitted as "No Discharge" when likely there were stormwater discharges based on NOAA historical daily rain data. Newaukum Creek is a 303(d) listed Category 5 waterbody for fecal coliform on Washington State Waters Quality Assessment site and report. Not knowing if corrective actions would have been triggered due to missed monitoring.
S3 Stormwater Pollution Prevention Plan (SWPPP)	The SWPPP submitted by the Facility on February 28 lacked a signed certification from the Permittee. The site map in the Facility's SWPPP fails to identify all receiving waters, including drainage ditches, in the immediate vicinity of the Facility. Facility representative thought stormwater flowed from Battersby Avenue through the catch basin and pipe 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 does not name which party may own the pictured stormwater drainage or discharge structures. 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. Facility representative thought one of the pipes observed during the inspection would convey the Facility's stormwater discharge and was unsure the source of discharge seen through another discharge point (another pipe). The site map does not give a unique identification number to either point, nor does it identify what other party may own the drainage of either discharge structure. Pollution prevention team not accurately illustrated. SWPPP sampling plan does not identify surface water discharge points.
S9 Reporting and Recordkeeping	Facility SWPPP was not immediately available to EPA inspector on site at time of inspection. On 1/19/23, EPA inspector requested records to be sent for review post-inspection. The facility did not send the records until 2/28/23, more than 14 days of a written request per Section 59.D.3. 11 of 12 DMRs between January 2020 and Quarter 4 of 2022 submitted late. No DMR submittals since Quarter 1 (April) of 2023. 2020 and 2021 annual reports submitted late. 2020 annual report signed on 8/9/21 and 2021 annual report signed on 1/11/23. 2022 annual report not submitted.