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# Stormwater Enforcement: U.S. Environmental Protection Agency and Auburn, Washington Wood Pallet Manufacturing Facility Enter into Consent Agreement

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The United States Environmental Protection Agency (“EPA”) and A-1 Pallets, Inc. (“A-1”) entered into a February 13th Consent Agreement (“CA”) alleging violations of the Clean Water Act National Pollutant Discharge Elimination System (“NPDES”) Stormwater Permit. See Docket No. CWA-10-2025-0026.

The CA provides that A-1’s operations include the manufacture of new wood pallets and the recycling and/or repair of used pallets.

The facility’s operations are characterized under Standard Industrial Classification code 2448 (wood container and pallet manufacturing). It has two stormwater catch basins that collect stormwater from areas associated with industrial activity at the facility and discharge stormwater into the Auburn stormwater conveyance system. This system flows to Mill Creek and the Green River.

A-1 has been authorized to discharge stormwater under the terms of an Industrial Stormwater General Permit since it became effective on January 1, 2020.

The CA alleges the following violations:

- Failure to Conduct Quarterly Sampling.
- Failure to Timely Submit Discharge Monitoring Reports.
- Failure to Provide All Required Information on Sampling Documents.
- Failure to Analyze pH Within Hold Time.
- Failure to Submit Annual Reports.
- Failure to Implement and Document Maintenance of Best Management Practices.
- Failure to Install, Inspect, and Maintain Catch Basins.
- Failure to Maintain a Complete Stormwater Pollution Prevention Plan.
- Failure to Vacuum, Cover Dumpsters, and Use Secondary Containment.
- Failure to Perform Monthly Visual Inspections.

A-1 neither admits nor denies the specific factual allegations contained in the CA.

The CA assesses a civil penalty of \$71,950.00.

A copy of the CA can be downloaded [here](#).

