

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code		NPDES						yr/mo/dy							Inspection Type				Inspector		Facility Type			
1 N	2 5	3 W A 0 0 4 0 5 3 3	11	12 1 8 1 2 0 5	17	18 R		19 S		20 2														
Remarks																								
21																								
										66														
Inspection Work Days					Facility Self-Monitoring Evaluation Rating					B1	QA	-----Reserved-----												
67		1.3		69		70	4		71	N	72	N	73			74	75							
1 80																								

Section B: Facility Data

Name and Location of Facility Inspected <i>(For industrial users discharging to POTW, also include POTW name and NPDES permit number)</i> Port of Olympia Cascade Pole Remediation Site 606 Columbia Street NW, Suite 300 Olympia, WA 98501	Entry Time/Date Approx. 10:30 AM 12/05/2018	Permit Effective Date July 1, 2015
	Exit Time/Date Approx. 12:00 PM 12/05/2018	Permit Expiration Date June 29, 2020
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number Name, Address of Responsible Official/Title/Phone and Fax Number Don Bache, Environmental Manager Port of Olympia 606 Columbia Street NW, Suite 300 Olympia, WA 98501 Phone 360-528-8062 DonBache@portolympia.wa.gov	Other Facility Data	
Consultant Information		

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

	Permit		Flow Measurement		Operations & Maintenance		CSO/SSO (Sewer Overflow)
x	Records/Reports		Self-Monitoring Program		Sludge Handling/Disposal		Pollution Prevention
X	Facility Site Review		Compliance Schedules		Pretreatment		Multimedia
X	Effluent/Receiving Waters		Laboratory		Stormwater	X	Other: MTCA cleanup site/Pumping-treating discharge

Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

Inspection Findings/Comments

Ecology representatives (Mohsen Kourehdar and Matt Morris) arrived at the site at approximately 10:30 AM and met Don Bache, from the Port of Olympia (the Port). The purpose of the site visit was general inspection/walk through of the groundwater pump and treat area, to observe operators record keeping practices, and to sample the influent and effluent.

We started by sampling the influent and effluent upon arrival and after sampling stored the sample bottles in the cooler with ice.

Next, we visited the groundwater pump/treat system area. During the walk through Mr. Bache stated he is doing maintenance on extraction wells and he showed part of the electrical system he got out of an extraction well. In Mr. Don Bache's office, I asked him if has a copy of permit and operating and maintenance (O&M) manual. Mr. Bache showed the files that he stores the whole effluent toxicity data, discharge monitoring results, O&M manual, previous and existing NPDES permits, and site's health and safety document.

At approximately 12 PM, Ecology thanked Mr. Bache and left the area.

Discharge Monitoring Review (DMRs)/Compliance

The DMRs were reviewed from July 2015- October 2018. During this period there was not any violations except for removal efficiency of Pentachlorophenol (PCP) in which the permit condition of 99.5% was not achieved. The reason for that was the influent PCP concentration are low and removal efficiency calculations are not meeting 99.5%. This permit condition should be eliminated in the next permit renewal cycle in 2020. This condition was designed in the original permitting process when the influent levels were high (>1000 ug/l for PCP). The Port has also been in compliance with all the other existing permit conditions and requirements.

Influent/Effluent Test Results

The following Table 1 shows the permit parameters influent and effluent test results and comparison with the permit limits. The results show the treatment system is operating properly and removes the contaminant of concern from the influent.

The influent/effluent samples were tested for BNA and Total suspended solids (TSS) by Method 2540D and by Methods SW 3510C/SW 8270D respectively. For complete test result please see Appendix A.

Table 1: Influent and effluent test results and comparison with the permit limits.

Parameter	Influent	Effluent	Permit Limit
Total Suspended Solids	14 mg/l	6 mg/l	15 mg/l
Pentachlorophenol (PCP)	24.1 µg/l	U	6.5 µg/l
PCP Removal Efficiency ¹	10 µg/l	U	99.5 %

U Effluent values are non-detect at Method Report Limit (MRL) of 0.0746 µg/l

1 The removal efficiency were calculated to be 99.84 %.

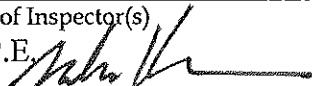

2 The removal efficiency was calculated based on the following formula:

(Influent - effluent/influent X 100%)

Comments

Recommended Actions

The Department will: 1) send copies of this inspection report to the Permittee.

Name(s) and Signature(s) of Inspector(s) Mohsen Kourehdar, P.E. 	Agency/Office/Tel. Number Ecology/SWRO (360) 407-6256	Date 11/18/2019
Name(s) and Signature(s) of Inspector(s)	Agency/Office/Tel. Number	Date
Signature of Management QA Reviewer Andrew Smith, P.E. 	Ecology/SWRO (360) 407-6257	Date 11/15/19

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Column 3 - 11: NPDES Permit No.: Enter the facility's NPDES permit number. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12 - 17: Inspection Date: Insert the date entry was made into the facility. Use the year/month/day format (e.g., 94/06/30 = June 30, 1994).

Column 18: Inspection Type: Use one of the codes listed below to describe the type of inspection:

A Performance Audit	L Enforcement Case Support	2 IU Sampling Inspection
B Compliance Biomonitoring	M Multimedia	3 IU Non-Sampling Inspection
C Compliance Evaluation (non-sampling)	P Pretreatment Compliance Inspection	4 IU Toxics Inspection
D Diagnostic	R Reconnaissance	5 IU Sampling Inspection with Pretreatment
E Corps of Engineers Inspection	S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment
F Pretreatment Follow-up	U IU Inspection with Pretreatment Audit	7 IU Toxics with Pretreatment
G Pretreatment Audit	X Toxics Inspection	
I Industrial User (IU) Inspection	Z Sludge	

Column 19: Inspector Code: Use one of the codes listed below to describe the *lead* agency in the inspection

C - Contractor or Other Inspectors (Specify in Remarks columns)	N - NEIC Inspectors
E - Corps of Engineers	R - EPA Regional Inspector
J - Joint EPA/State Inspectors-EPA Lead	S - State Inspector
	T - Joint State/EPA Inspectors-State Lead

Column 20: Facility Type: Use one of the codes below to describe the facility.

- 1 - Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 - Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 - Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 - Federal. Facilities identified as Federal by the EPA Regional Office.

Columns 21-66: Remarks: These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days: Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating: Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information: Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection: Enter Q if the inspection was conducted as follow-up on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, and other updates to the record).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection. The heading marked "Multimedia" may indicate medias such as CAA, RCRA, and TSCA. The heading marked "Other" may indicate activities such as SPCC, BMPs, and concerns that are not covered elsewhere.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.