

State of Washington Department of Ecology
Northwest Regional Office
**STORMWATER COMPLIANCE INSPECTION
REPORT**

WADOE Stormwater
Compliance Inspection Form
(last file update 4-04.)

Facility Type: ☐ Shipyard
☒ Industrial ☐ Boatyard
☐ Construction ☐ S & G

Section A: General Data

Inspection Date March 26, 2019	NPDES Permit # WA-00 30830	County King	Receiving Waters Mud Lake Creek, Ginder Lake, Lake 12
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Discharges to: Surface Water ☒ Ground Water ☐ Weather at time of inspection: Clear, Sunny

Section B: Facility Data

Name and Location of Facility Inspected PACIFIC COAST COAL COMPANY, 30700 Black Diamond-Ravensdale Road Black Diamond, WA 98010	Entry Time 1:10 pm	Permit Effective Date March 01, 2008
	Exit Time 6:00 pm	Permit Expiration Date January 11, 2013 Permit extended

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. David Morris Owner/Operator P.O. Box 450 Black Diamond, WA 98010	Other Participants: Jacob Carnes Hydrogeologist, Ecology/NWRO John Spencer Shumate Natural Resources Specialist OSMRE/Western Region e-mail: jshumate@osmre.gov
Name, Address of Responsible Official/Title/Phone and Fax Number. Mr. David Morris Owner/Operator P.O. Box 450 Black Diamond, WA 98010	Samples Taken? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Photos Taken? <input checked="" type="checkbox"/> <input type="checkbox"/>
Phone Number 2063215984 Fax Contacted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Section C: Areas Evaluated During Inspection.

<input type="checkbox"/> NPDES Permit Available	<input type="checkbox"/> Wet & Dry Season Inspection Reports	<input checked="" type="checkbox"/> Operations & Maintenance	<input checked="" type="checkbox"/> Effluent/Receiving Water
<input type="checkbox"/> Storm Water Pollution Prevention Plan Available	<input type="checkbox"/> Employee Training Records	<input type="checkbox"/> Oil/Water Separator	<input type="checkbox"/> Pretreatment
<input type="checkbox"/> SPCC Plan & Equipment	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Solid Waste Disposal	<input type="checkbox"/> Laboratory
<input type="checkbox"/> Erosion and Sediment Control Plans	<input type="checkbox"/> Monitoring Plan	<input type="checkbox"/> Catch Basins	<input type="checkbox"/> 0.5 inch Inspection Logs
<input type="checkbox"/> DMR Submittals	<input checked="" type="checkbox"/> Fuel/Chemical Storage	<input checked="" type="checkbox"/> Track out / Wheel wash	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Section D: Summary of Findings/Comments

BACKGROUND

John Henry No. 1 Mine is a coal mining and processing facility owned and operated by Pacific Coast Coal Company (PCCC). This facility is located near the City of Black Diamond and has not been mining since 1999. On April 18, 2018, Federal Office of Surface Mining Reclamation and Enforcement (OSMRE) approved significant permit revision to PCCC's mining permit.

Ecology regulates the discharge of stormwater and process water generated at the facility through a National Pollutant Discharge Elimination System (NPDES) permit. Until the facility is fully reclaimed, Ecology will require PCCC to maintain coverage under an individual NPDES permit. The current individual

NPDES permit for this facility was issued in March 2008 and was later modified in 2012. PCCC submitted its NPDES permit renewal application to Ecology in March 2018 and additional permit application information in August 2018 and February 2019. Ecology is currently in the process of renewing the NPDES permit for the facility.

INSPECTION

This was an announced site inspection, jointly conducted by the Department of Ecology and OSMRE. OSMRE inspects this facility every month and has recently issued a Notice of Violation to PCCC for not complying with the requirements of their Federal mining permit. The purpose of this site inspection was to meet the site owner, Mr. David Morris and assess the site condition.

Mr. Jacob Carnes (Ecology), Mr. John Shumate and I reached the site around 1:10 pm and met Mr. David Morris. Mr. Morris introduced us to Mr. Dave Smith who is responsible for site security. We had discussions about site status with Mr. Morris and then he left around 1:45 pm. Mr. Shumate, Mr. Carnes and I proceeded with the site inspection.

OBSERVATIONS & MEETING NOTES

- 1) Mr. Morris said that he is focusing on reclamation only for the next 18 months and not planning to start coal mining as he does not have any potential buyers for the coal. He will focus on mining as and when he finds a potential buyer. I asked him about PCCC's purpose for sending pre-blasting surveys to the neighbors, to which he responded that this is an OSMRE requirement and he is trying to follow the process in case he needs to start mining.
 - 2) We saw heavy earth moving equipment on site (Photo 1). Mr. Morris informed us that he has purchased some equipment from other states and he is in the process of getting some more. He was planning to get all the equipment up and running for reclamation. Mr. Eric Wheeler, who is an independent contractor, will be working on the site for reclamation.
 - 3) We expressed our concerns about wheel wash condition and its maintenance, to which Mr. Morris responded that during reclamation all the work will be conducted inside project boundaries and he is not anticipating increased traffic in or out of the site.
 - 4) For project phasing purposes PCCC is planning to conduct more reclamation work during summer and slow down during winter.
 - 5) There are no plans to store any kind of fuel or oil on the facility. All the equipment will be fueled in-place with mobile fueling station.
 - 6) An independent contractor will be hired to haul off and dispose of all the solid waste generated on site.
- I informed Mr. Morris that PCCC will need to update the SWPPP to reflect all the changes on the site.
- 7) After Mr. Morris left we walked to the fuel and oil storage area. Most of the containers were removed from the area but we saw a few containers lying all around the fuel storage area. Berm around this storage area was damaged at a few locations and the cover was too high to prevent rain from falling in this area. (Photo 2, 3, 4).
 - 8) We noted water flowing out of the coal washing plant (Photo 5, 6). This water was flowing downhill in the direction of Ginder Lake. We also observed sheen on the water. Later when we met Mr. Smith, he informed us that there is a leakage in the coal washing plant and he is working to fix it.
 - 9) There was metallic waste piled up in coal processing area, fuel storage area and few other places on site (Photo 7, 8, 9).
 - 10) We drove around the site and did not see any mining or reclamation activities. Then we drove to the Water Quality monitoring locations. We did not observe anything out of the ordinary at these locations.

CONCLUSIONS

There were no mining or reclamation activities going on at the site at the time of the inspection. As per our discussion with Mr. Morris, PCCC plans to mainly focus on the reclamation for the next 18 months.

Based upon visual inspection it appeared that wheel wash and coal washing plant need significant maintenance before beginning operation. Current permit requires wheel wash to be improved before resuming hauling offsite.

PCCC must store or dispose of oil containers appropriately. Fuel storage area should either be cleaned before decommissioning or repairs/maintenance must be done prior to using this area for any kind of fuel storage




Metallic waste and other waste should be stored or disposed of appropriately. Ecology recently sent warning letter to PCCC for not meeting copper effluent limits. Better maintenance and storage of metallic waste on site can improve compliance with the permit limits.

As per condition S14 B. 2. of the permit, PCCC shall maintain an inventory of material handled at the site that are exposed to precipitation or runoff.

As per condition S14.A.4. of the permit, PCCC shall modify the SWPPP to address all the changes in operation and maintenance and submit the modification to Ecology prior to resuming operations.

Monika Kannadaguli, facility manager, should be contacted at 425-649-7028 with permit related questions. Gretchen Onstad should be contacted at (425) 649-7034 with any compliance related questions.

Attachments: Photos

Name(s) and Signatures of Inspector(s) Monika Kannadaguli, PE, CPESC 	Agency/Office/Telephone WA Dept. of Ecology/ NW Regional Office/ 425-649-7028 3190 160 th Ave SE, Bellevue, WA 98008-5452	Date April 22, 2019
Jacob Carnes 	WA Dept. of Ecology/NWRO/ (425) 649-7000 Fax (425) 649-7098	April 22, 2019
Signature of Management Q A Reviewer Gerald Shervev. P.E. 	Agency/Office/Phone and Fax Numbers WA Dept. of Ecology/NWRO/ (425) 649-7000 Fax (425) 649-7098	May 15, 2019

ANNOUNCED Inspection



Photo 1: Pacific Coast Coal Company

Date: March 26, 2019
Taken by: Monika Kannadaguli
Witness: Jacob Carnes, Ecology
John Spencer Shumate, OSMRE

Description: Newly purchased on-site equipment.



Photo 2: Pacific Coast Coal Company

Date: March 26, 2019
Taken by: Monika Kannadaguli
Witness: Jacob Carnes, Ecology
John Spencer Shumate, OSMRE

Description: Berm around the fuel and oils storage area was damaged at few locations. Overall cleaning and maintenance needed in this area. Either clean this area prior to decommissioning or provide better secondary containment and cover to avoid rain exposure.



Photo 3: Pacific Coast Coal Company

Date: March 26, 2019
Taken by: Monika Kannadaguli
Witness: Jacob Carnes, Ecology
John Spencer Shumate, OSMRE

Description: Oil lubricant containers on site. These containers need to be disposed-off properly or moved to a covered area.



Photo 4: Pacific Coast Coal Company

Date: March 26, 2019
Taken by: Monika Kannadaguli
Witness: Jacob Carnes, Ecology
John Spencer Shumate, OSMRE

Description: Oil tanks. Crumpled tarpaulin was placed under the tap to capture drips. We could not find whether the tanks were empty or filled. BMPs should include cover and containment as well as drip pans.



Photo 5: Pacific Coast Coal Company

Date: March 26, 2019
Taken by: Monika Kannadaguli
Witness: Jacob Carnes, Ecology
John Spencer Shumate, OSMRE

Description: Water Leakage from the Coal Washing Plant. This is a closed circuit plant with no process water discharge. No coal washing was happening at the time of the inspection. Mr. Smith was working to find the source of the leakage.



Photo 6: Pacific Coast Coal Company

Date: March 26, 2019
Taken by: Monika Kannadaguli
Witness: Jacob Carnes, Ecology
John spencer Shumate, OSMRE

Description: Sheen on the water flowing out of the coal washing plant.



Photo 7: Pacific Coast Coal Company

Date: March 26, 2019
Taken by: Monika Kannadaguli
Witness: Jacob Carnes, Ecology
John spencer Shumate, OSMRE

Description: Metallic and other waste around the site.



Photo 8: Pacific Coast Coal Company

Date: March 26, 2019
Taken by: Monika Kannadaguli
Witness: Jacob Carnes, Ecology
John spencer Shumate, OSMRE

Description: Metallic and other waste around the site.



Photo 9: Pacific Coast Coal Company

Date: March 26, 2019

Taken by: Monika Kannadaguli

Witness: Jacob Carnes, Ecology
John Spencer Shumate, OSMRE

Description: Metallic and other waste around the site.