



NPDES Compliance Inspection Report

Dunlap Towing Co. – Olympia Log Yard

Olympia, WA

Permit # WAR000106

Inspection Date: September 2, 2020

Prepared by:

Rachel Stephenson

U.S. Environmental Protection Agency, Region 10

Enforcement and Compliance Assurance Division

Water Enforcement and Field Branch

Field, Data, and Drinking Water Enforcement Section

Inspector Signature/Date:

Supervisor Signature/Date:

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[Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. McNally; or from observations during the inspection.]

I. Facility Information

Facility Name: Olympia Log Yard Dunlap Towing Co.

Facility Owner/Operator: Dunlap Towing Co.

Facility Contacts: Tom McNally
Olympia Log Yard Manager
Dunlap Towing Co.
Phone: (360) 352-5520
tomm@dunlaptowing.com

James Dunlap
Owner
Dunlap Towing Co.
Phone: (360) 466-2114
jimd@dunlaptowing.com

Facility Location: 2003 Westbay Drive NW
Olympia, WA 98502

Lat/Long: +47.0669403°, -122.918464°

Mailing Address: Dunlap Towing Co.
P.O. Box 593
La Conner, WA 98257

NPDES Permit Number: WAR000106

II. Inspection Information

Inspection Date: September 2, 2020

Inspectors: Rachel Stephenson, Inspector
EPA/R10/ ECAD/WEFB/FDDWES
(206) 553-6366

Arrival Time: 10:10 AM

Departure Time: 12:18 PM

Weather Condition: Sunny

Receiving Water: Budd Inlet

Purpose: This inspection was conducted to document the facility's compliance with the National Pollutant Discharge Elimination System (NPDES), under the Industrial Stormwater General Permit (Permit # WAR000106).

III. Permit Information

This facility is permitted under the State of Washington Department of Ecology's Industrial Stormwater General Permit (ISGP) number WAR000106. The permittee certified a renewal Notice of Intent (NOI) to discharge pursuant to the permit on June 28, 2019. The permit became effective on January 1, 2020; the expiration date is December 31, 2024. Olympia Log Yard was covered under the previous iteration of the ISGP (effective July 1, 2012).

This facility was last inspected by the State of Washington Department of Ecology (Ecology) in January of 2020.

IV. Inspection Chronology

This was an announced inspection. A few weeks prior to the inspection, I spoke with Tom McNally over the phone; we discussed the logistics of the inspection and agreed upon a start time of 10:00 AM.

For this inspection, I operated as the lead inspector. I arrived at Olympia Log Yard at 10:00 AM on August 20, 2020. I called Mr. McNally upon arrival at the site office and he met me there at 10:10 AM. At this time, I identified myself as an EPA inspector and presented my credentials to him. We also exchanged business cards. I informed him that the purpose of the visit was to conduct a compliance inspection under the facility's NPDES Permit WAR000106 (henceforth, this will be referred to as the Permit). I was not denied access to the facility.

I conducted the opening conference with Mr. McNally in the site office. The opening conference involved a discussion of the purpose and expectations of the inspection. I reviewed a few files that were readily available, saving the remainder of the file review for the end of the facility walk-through.

Following the opening conference, a facility walk-through took place. At the conclusion of the walk-through, I conducted an in-depth file review in the site office. After the file review, I concluded the inspection with a closing conference to discuss observations and notes taken throughout the course of the inspection. I was

accompanied throughout the inspection by Mr. McNally. I left Olympia Log Yard at 12:18 PM.

V. Background and Activity

Olympia Log Yard is owned and operated by Dunlap Towing Company, which was founded in 1925 (www.dunlaptowing.com). Olympia Log Yard is situated on historic Buchanan mill land from the 30s and 40s, but has operated as a towing and logging facility for over 30 years.

Dunlap Towing Co. typically has 6 employees at Olympia Log Yard, including Mr. McNally. Mr. McNally has been working for Dunlap Towing Co. for 39 years, serving as the Log Yard Manager at Olympia Log Yard for the past 12 years. He handles the management of daily operation, along with all stormwater monitoring and reporting at Olympia Log Yard. James Dunlap is the current permittee and owner of Olympia Log Yard.

Mr. McNally informed me that the COVID-19 pandemic had little impact on business and operation at Olympia Log Yard. He explained that business had already been steadily declining since the recession of 2008. At the start of Mr. McNally's time at Olympia Log Yard, the facility had 8-10 customers (45-60 outbound loads per year). Currently, the facility only has 1 inbound customer and a few outbound customers.

VI. Facility Review

Olympia Log Yard is located in northwest Olympia, along the southwestern edge of Budd Inlet. See **Attachment A**, Aerial Map. According to the NOI, the facility encompasses 14 acres of land. The facility is almost entirely unpaved.

Olympia Log Yard is a towing and logging facility, with operation occurring both on land and in water. Typical daily operations involve inbound and outbound procedures. For the inbound process, a loaded truck arrives at the entrance to the facility, where it is banded (3 metal bands per load). Bundle tags and paperwork are taken care of, the truck moves to the rear of the facility, and the bundled load is transferred to skids. The load is later weighed on a scale and then placed in the water (Budd Inlet) for storage. For the outbound process, a raft from the log storage area in Budd Inlet is transferred to an area that is referred to as the "pockets". A bundle of wood is then pushed up the raft via boat, where it is picked up out of the water and placed on deck or on a shovel. The water access ramp, which is a gravel incline that allows equipment/vehicle access to Budd Inlet for log transfer, is not sampled for stormwater (See **Attachment B**, **Photo 45**).

This facility contains 2 outfalls, which are referred to as Outfall A and Outfall B. Outfall A corresponds to Monitoring Point 001 in the Discharge Monitoring Reports

(DMRs); Outfall B corresponds to Monitoring Point 002 in the DMRs. Outfall B is a new outfall that was included in the 2019 renewal NOI under the current iteration of the Permit. Mr. McNally explained that this outfall generally exhibits no discharge and is coded as “C – No Discharge” in the DMRs submitted through Ecology’s WebDMR system. Quarter 1 of 2020 was the only quarter where discharge was detected, sampled, and reported.

Stormwater is collected and routed via a series of storm drains. Some of the stormwater is routed to a 3-stage oil water separator, while the rest is collected in a storm ditch located along the southeastern border of the facility. Water is pumped from the oil water separator to a newly upgraded tank and is later discharged through Outfall B. The storm ditch carries the discharge from Outfall A to Budd Inlet. Mr. McNally mentioned that there have been issues with materials from neighboring businesses entering the storm ditch. He explained that he often finds garbage and other debris in the ditch, which he cleans out during his monthly site inspections and/or whenever he sees trash present. The oil water separator is cleaned annually.

Several upgrades were recently conducted at the facility, involving both removal of old materials and installation of new equipment. The new oil water separator tank was installed a few years ago. The facility also transitioned from using a hydrant to fill their water trucks, to using a pump system. These water trucks are used to spray the facility grounds to prevent dust and wood shavings from getting swept up by the wind. Mr. McNally indicated that he plans to decommission and get rid of old equipment. He was able to have the large 2,000 gallon fuel tank removed in 2019, but he wants to have the additional double-walled tanks and drums removed over the next few years. He plans to purchase and build a shed to house the oil drums, which would allow Marine Vacuum Service, Inc. (Mar-Vac) to come in, pump, and remove the drums from the site. Olympia Log Yard used to offer a wood-chipping service, which was halted following the recession-related issues of 2008. Mr. McNally plans to decommission the old chipping equipment, as it is no longer in use.

Visual site inspections are conducted on a monthly basis. Mr. McNally informed us that he personally conducts these inspections every month and maintains the inspection records in the site office. Turbidity, pH, Total Suspended Solids (TSS), zinc, copper, and Chemical Oxygen Demand (COD) samples are taken at both outfalls on a quarterly basis. Libbey Environmental, Inc. out of Olympia, WA handles the analysis of all stormwater samples for Olympia Log Yard.

See **Attachment A**, which is an aerial map of the facility. See **Attachment B**, which is photographic documentation of the facility as seen during the site review.

VII. Records Review

The following documents were reviewed:

- Stormwater Pollution Prevention Plan (SWPPP) – A copy of the SWPPP was on-site at the time of the inspection. The SWPPP was prepared by Tom McNally; last updated in March of 2010. I conducted an in-depth review of the SWPPP during the inspection.
- Current NPDES Industrial Stormwater General Permit – There was a copy of the previous iteration of the permit on-site at the time of the inspection. There was an electronic copy of the current iteration of the permit on-site at the time of the inspection.
- Stormwater Sampling Logs and Analysis Records– There were sampling records, chain-of-custody forms, and laboratory analysis reports on-site at the time of the inspection.
- Monthly Inspection Reports – The Inspection Reports were on-site at the time of the inspection.
- Annual Reports – There were copies of the Annual Reports for the last 5 years at the time of the inspection.

VIII. Areas of Concern

A. Benchmark Exceedances

Section S5.A.2. of the Permit states that, “If a Permittee's discharge exceeds a benchmark listed in Table 2, the Permittee shall take the actions specified in Condition S8.” See Table 2, below:

Table 2: Benchmarks and Sampling Requirements Applicable to All Facilities

Parameter	Units	Benchmark Value	Analytical Method	Laboratory Quantitation Level ^a	Minimum Sampling Frequency ^b
Turbidity	NTU	25	EPA 180.1 Meter	0.5	1/quarter
pH	Standard Units	Between 5.0 and 9.0	Meter/Paper ^c	±0.5	1/quarter
Oil Sheen	Yes/No	No Visible Oil Sheen	N/A	N/A	1/quarter
Copper, Total	µg/L	Western WA: 14 Eastern WA: 32	EPA 200.8	2.0	1/quarter
Zinc, Total	µg/L	117	EPA 200.8	2.5	1/quarter

Prior to the inspection, I conducted a review of the facility's DMR data records. During my review, I noted two instances of reported benchmark exceedances, both in Quarter 1 of 2020. For both monitoring locations (Outfalls A and B), there were

recorded turbidity exceedances in Q1. The reported measurement values for these exceedances were 44.7 Nephelometric Turbidity Units (NTU) and 44.1 NTU. I mentioned these exceedances to Mr. McNally during the inspection, he indicated that storm events may have contributed to this increase in average turbidity during that quarter.

Section S8.B. of the Permit states that, “Permittees that exceed any applicable benchmark value(s) in Table 2.... for any quarter during a calendar year shall complete a Level 1 Corrective Action for each parameter exceeded in accordance with the following:

1. Within 14 days of receipt of sampling results that indicate a benchmark exceedance during a given quarter⁷; or, for parameters other than pH or visible oil sheen, the end of the quarter, whichever is later:
 - a. Conduct an inspection to investigate the cause.
 - b. Review the SWPPP and ensure that it fully complies with Permit Condition S3, and contains the applicable BMPs from the appropriate Stormwater Management Manual.
 - c. Make appropriate revisions to the SWPPP to include additional operational source.
2. Summarize the Level 1 Corrective Actions in the Annual Report (Condition S9.B)
3. Level One Deadline: The Permittee shall sign/certify and fully implement the revised SWPPP according to Permit Condition S3 and the applicable Stormwater Management Manual as soon as possible, but no later than the DMR due date for the quarter the benchmark was exceeded.”

Although the exceedances were reported in the DMRs for Q1, there was no accompanying note or comment regarding any corrective actions taken in response to these exceedances.

IX. Closing Conference

A closing conference was held with Mr. McNally to discuss my inspection observations. I thanked him for his time and cooperation with the inspection. I left the facility at 12:18 PM.

ATTACHMENT A

Aerial Map



ATTACHMENT B

Photograph Log

All photographs taken by Rachel Stephenson on September 2,
2020 Nikon Coolpix AW120, Serial # 32057443

Photo Log – Olympia Log Yard Dunlap Towing Co.

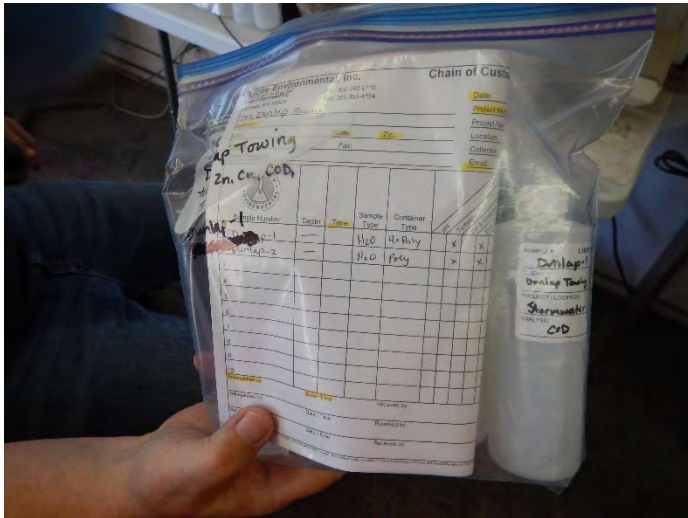


Photo #:01 (DSCN0399)

Description: Photo of chain of custody form and associated sample bottles.



Photo #:02 (DSCN0400)

Description: Facing northeast, photo of site entrance, truck load processing area, and load banding equipment.



Photo #:03 (DSCN0401)

Description: Facing east, photo of drum containing metal bands for load banding.



Photo #:04 (DSCN0402)

Description: Facing east, photo of banding equipment.

Photo Log – Olympia Log Yard Dunlap Towing Co.

Photo #:05 (DSCN0403)

Description: Facing northwest, photo of the facility operation.



Photo #:06 (DSCN0404)

Description: Facing west, photo of a truck with a load.



Photo #:07 (DSCN0405)

Description: Facing northwest, photo of one of the storm drains, surrounded by hay bales.



Photo #:08 (DSCN0406)

Description: Facing northwest, photo of the storm ditch connected to Outfall A.

Photo Log – Olympia Log Yard Dunlap Towing Co.

Photo #:09 (DSCN0407)

Description: Photo of the storm ditch connected to Outfall A. Logs have been placed intermittently to reduce flow rate.



Photo #:10 (DSCN0408)

Description: Facing west, photo of Outfall A. Stormwater samples are taken here.



Photo #:11 (DSCN0409)

Description: Photo of storm ditch connected to Outfall A. Logs have been placed intermittently to reduce flow rate.



Photo #:12 (DSCN0410)

Description: Facing northwest, photo of oil water separator housing.

Photo Log – Olympia Log Yard Dunlap Towing Co.

Photo #:13 (DSCN0411)

Description: Photo of storm drain leading to oil water separator.



Photo #:14 (DSCN0412)

Description: Facing west, photo of empty 55 gal drum.



Photo #:15 (DSCN0414)

Description: Facing east, photo of oil water separator housing.



Photo #:16 (DSCN0415)

Description: Facing east, photo of loaded skid. Load transfer process happening behind the skid.

Photo Log – Olympia Log Yard Dunlap Towing Co.

Photo #:17 (DSCN0416)
Description: Facing east, photo of load transfer process.



Photo #:18 (DSCN0417)
Description: Facing northwest, photo of truck loading process.



Photo #:19 (DSCN0418)
Description: Facing southeast, photo of a load.



Photo #:20 (DSCN0419)
Description: Facing northwest, photo of load cleaning process, where the logs are stripped of loose bark to reduce litter during transfer process. The discarded bark is left in the large pile on the right.

Photo Log – Olympia Log Yard Dunlap Towing Co.

Photo #:21 (DSCN0420)
Description: Photo of the pile of discarded log bark.



Photo #:22 (DSCN0421)
Description: Facing southeast, photo of facility operation.



Photo #:23 (DSCN0422)
Description: Facing north, photo of old equipment location.



Photo #:24 (DSCN0423)
Description: Facing north, photo of Outfall B. Stormwater samples are taken here.

Photo Log – Olympia Log Yard Dunlap Towing Co.

Photo #:25 (DSCN0424)

Description: Facing north, photo of old woodchipping equipment, “pockets”, and Outfall B.



Photo #:26 (DSCN0425)

Description: Facing north, photo of Outfall B and old equipment.



Photo #:27 (DSCN0426)

Description: Facing west, photo of old woodchipping area and associated equipment.



Photo #:28 (DSCN0427)

Description: Facing northwest, photo of old woodchip storage area.

Photo Log – Olympia Log Yard Dunlap Towing Co.

Photo #:29 (DSCN0428)
Description: Facing southwest, photo of fuel cube and equipment storage area.



Photo #:30 (DSCN0429)
Description: Photo of one of the storm drains.



Photo #:31 (DSCN0430)
Description: Photo of the 3-stage oil water separator.



Photo #:32 (DSCN0431)
Description: Facing south, photo of one of the storm drains.

Photo Log – Olympia Log Yard Dunlap Towing Co.

Photo #:33 (DSCN0432)

Description: Photo of one of the storm drains.



Photo #:34 (DSCN0433)

Description: Photo of stormwater flow pattern leading to one of the storm drains.



Photo #:35 (DSCN0434)

Description: Facing west, photo of miscellaneous dumpster.



Photo #:36 (DSCN0435)

Description: Facing northwest, photo of water truck.

Photo Log – Olympia Log Yard Dunlap Towing Co.

Photo #:37 (DSCN0436)
Description: Facing north, photo of discarded logs.



Photo #:38 (DSCN0437)
Description: Facing north, photo of in-water log storage area.



Photo #:39 (DSCN0438)
Description: Facing west, photo of water truck with water leakage.



Photo #:40 (DSCN0439)
Description: Facing west, photo of old double-walled tank and oil drums. Plan to get rid of this in the future.

Photo Log – Olympia Log Yard Dunlap Towing Co.

Photo #:41 (DSCN0440)

Description: Photo of old oil drums. Plan to get rid of them in the future.



Photo #:42 (DSCN0441)

Description: Facing northeast, photo of old and unused equipment.



Photo #:43 (DSCN0442)

Description: Facing south, photo of drainage ditch running along the western border of the facility.



Photo #:44 (DSCN0443)

Description: Photo of water accumulation on-site.

Photo Log – Olympia Log Yard Dunlap Towing Co.

Photo #:45 (DSCN0444)

Description: Facing northeast, photo of water access ramp for loading/unloading logs.



Photo #:46 (DSCN0445)

Description: Facing west, photo of loads, skids, and water accumulation.



Photo #:47 (DSCN0446)

Description: Facing east, photo of old banding materials. Plan to get rid of this in the future.



Photo #:48 (DSCN0447)

Description: Facing east, photo of load scale.

Photo Log – Olympia Log Yard Dunlap Towing Co.



Photo #:49 (DSCN0448)

Description: Facing east, photo of new water pump system to refill the water truck.



Photo #:50 (DSCN0449)

Description: Facing west, photo of old water hydrant system. No longer used to refill water truck.



Photo #:51 (DSCN0450)

Description: Facing west, photo of refueling truck.

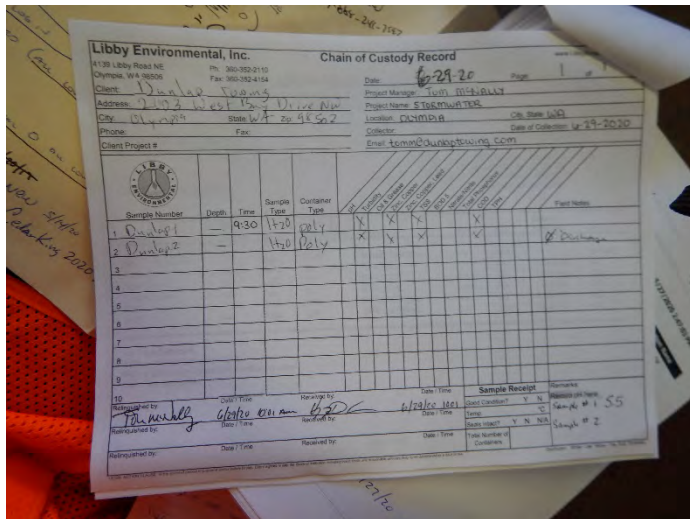


Photo #:52 (DSCN0451)

Description: Photo of a chain of custody record.