



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 June 9, 2021	NPDES Permit # WA-00330830	County King	Receiving Waters Mud Lake Creek, Ginder Lake, Lake 12
Discharges to: Surface Water <input checked="" type="checkbox"/> Ground Water <input type="checkbox"/>		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 9:30 am	Permit Effective Date March 01, 2008
	Exit Time 11:15 am	Permit Expiration Date January 11, 2013 Permit extended
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Erik Wheeler, Construction Project Manager 29312 SE 408th St Enumclaw, WA 98022 Black Diamond, WA 98010 Email: ewheeler@wheelercc.net	Other Participants: Daniel MacKinnon Natural Resources Specialist, OSMRE Ph: 970.310.5993; E: dmackinnon@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? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Phone Number 2063215984 Fax	Photos Taken? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
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. The mining authorization for this facility initially granted by the Federal Office of Surface Mining Reclamation and Enforcement (OSMRE) has expired.

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.

This was an announced site inspection coordinated by OSMRE Natural Resource Specialist Daniel MacKinnon and Ecology Sand and Gravel Permit Manager, Jay Fennell. The inspection was initiated through concerns that arose from a previous inspection conducted by Spencer Shumate from OSMRE. The concerns regarded an unpermitted discharge of mine dewatering water from Pit 1 overflowing into Mud Lake during the inspection on April 21, 2021. Mr. Shumate also cited potential water quality impacts to Mud Lake from the discharge.

The purpose of this inspection was to investigate the cause of the discharge, observe the current status of dewatering activities at Pit 1, and document observations relating to NPDES permit requirements

Jay Fennell took all photos at the time of the inspection.

INSPECTION OBSERVATIONS & FINDINGS

Mr. Fennell and Mr. MacKinnon arrived at the site at around 9:30 am. They met with the Project Manager for the site's reclamation activities Erik Wheeler, who escorted Ecology and OSMRE staff around the facility. Because of the limited scope of the inspection, Ecology did not review any PCCC submittal records, sampling records, or inspection records at the time of this inspection.

The inspection began with a brief overview of the truck wash basin and sampling area near the site office. Ecology observed no permit compliance issues concerning this feature.

The inspection continued on to observe PCCC's dewatering activities at Pit 1. The access road along the west side of Pit 1 consists of a rock dam/dike to prevent water from the pit from discharging into the wetlands surrounding Mud Lake. This is the location where OSMRE observed discharges during their April 21, 2021 inspection (photos 1-2)

At the time of the inspection, Ecology observed no discharges entering Mud Lake from Pit 1. Discussions with Mr. Wheeler indicated that pausing mine-dewatering at Pit 1 caused the water to overflow into Mud Lake.

Mr. Wheeler described plans to maintain the Pit 1 dike by replacing the existing rock, adding roughly 20 tons of quarry spalls, and removing accumulated wood debris. He also stated plans to install a second dewatering pump to further lower the Pit 1 water levels. This would reduce the chance of water overtopping the dike and discharging into Mud Lake. The pump would run continuously during the planned maintenance at the Mud Lake dike, and while mine reclamation continues.

The inspection continued to the various permitted outfalls and monitoring points within the site. Specifically, Ecology observed the I Pond monitoring points, and H2 Pond monitoring points. Both ponds were discharging to Mud Lake Creek at the time of the inspection.

Due to time constraints, Mr. Wheeler departed from the facility while Ecology and OSMRE continued to inspect the facility's maintenance and storage areas near the site office.

Inspection of the facility's maintenance shed and workshop showed two barrels of unlabeled fluids on a pallet stored outside with no within secondary containment. The entrance to the workshop is graded to slope inward to provide containment for all fluids stored within the shop (photos 3-4).

Situated next to a covered maintenance area, Ecology observed a roll-off dumpster full of scrap metal waste. The bin appeared full and did not have a cover to prevent rainwater from accumulating within the dumpster (photo 5). Ecology is unaware of any waste removal schedule implemented at the site.

In a covered maintenance area across from the site office, Ecology observed multiple areas of stained soils. It appeared that the facility consistently conducts vehicle maintenance over bare ground. Ecology could not locate any spill kits nearby the maintenance area (Photos 6-8).

RECOMMENDATIONS

The Department of Ecology observed the following permit concerns during the inspection. Recommended corrective actions are also provided.

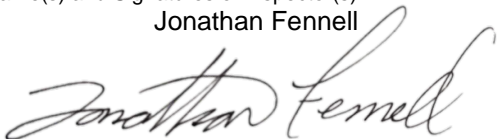

At the time of this inspection, Ecology observed no discharge into the lake. As long as mine dewatering continues as designed, Pit 1 should not be at risk of overflowing and incidentally overtopping into Mud Lake (photos 1-2) Planned or unplanned discharges into Mud Lake must be monitored to ensure discharges comply with Permit Section S1.A, and the State Water Quality Standards under WAC 173-201A.

The permittee must store all chemical fluids within secondary containment to comply with section S12.B.3. of the permit. Ecology recommends placing the drums observed during the inspection within the graded entrance, or provide cover and secondary containment for all chemical fluids stored out in the open (photos 3-4). All containers should also contain a label describing their contents. Provide Ecology with documentation of compliance with permit section S12.B.3 within 30 days.

Provide a waste disposal schedule for the scrap metal dumpster to Ecology within 30 days (photo 5). Solid waste must be handled and disposed of in a manner that prevents its entry into waters of state, as required by permit section S5.A.

Permittee must immediately clean and dispose of all oil/petroleum contaminated soil and implement BMPs that prevent spills to pervious surfaces when conducting vehicle and equipment maintenance. Provide documentation of compliance with section S11 of the permit within 30 days (photos 6-8).

Attachments: Photo log with descriptions

Name(s) and Signatures of Inspector(s) Jonathan Fennell 	Agency/Office/Telephone WA Dept. of Ecology/ NW Regional Office/ 425.240.4234	Date 06/23/2021
Signature of Management, Q A Reviewer Monika Kannadauli 	Agency/Office/Phone and Fax Numbers WA Dept. of Ecology/NWRO/	7/16/2021

ANNOUNCED Inspection

**Photo 1: [IMG_0836]**

Description: Access road on west end of Pit 1 functions as a dike between the pit and the wetlands surrounding Mud Lake. Woody debris and vegetation covers much of the road due to Pit 1 overflow observed by OSMRE in April 2021.

**Photo 2: [IMG_0837]**

Description: Opposite side of Pit 1/Mud Lake dike. Ecology did not observe discharges entering Mud Lake from Pit 1 at the time of the inspection.

**Photo 3: [IMG_0853]**

Description: Maintenance, storage, and repair shed with containment lip. Two 55-gallon barrels were staged outside of containment area and lacked secondary containment. Tops of barrels had accumulated stormwater.

**Photo 4: [IMG_0851]**

Description: Close up of rain water accumulated on 55-gallon drums near maintenance shed. Ecology did not notice any labels identifying the content of the drums.

**Photo 5: [IMG_0855]**

Description: Uncovered roll-off dumpster for gathering metallic waste.

**Photo 6: [IMG_0856]**

Description: Stained soils located under large outdoor maintenance area. Ecology observed several instances of stained soils within this maintenance area.

**Photo 7: [IMG_0857]**

Description: Alternate view of soil stains underneath covered maintenance area.

**Photo 8: [IMG_0862]**

Description: Covered maintenance area across from the site office trailers where stained soils, along with several containers of chemical fluids without secondary containment, were observed throughout the area.