



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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April 15, 2022

Richard Dickson
Dickson Company
PO Box 110880
Tacoma, WA 98411-0880

**Re: Dickson Company - Waller Rd Pit- Sand & Gravel General Permit No. – WAG501405
Compliance Inspection**

Dear Richard Dickson:

The Department of Ecology (Ecology) conducted a compliance inspection of the Dickson Company - Waller Rd Pit (Facility) on March 10, 2022. Enclosed is a copy of the Inspection Report and Photograph Log for your records. The following findings are provided to assist the facility in maintaining compliance with the Sand and Gravel General Permit.

Findings

The maintenance shop was inspected and found to have secondary containment for liquid chemical storage and an impervious surface with an oil/water separator for runoff collection. Maintenance records for oil/water separator show a recent servicing on March 7, 2022.

I measured exceedances of the pH effluent limit (6.5-8.5) in ponding water near the concrete recycling area, within an unlined collection impoundment and within the main infiltration pond. There is a significant accumulation concrete crushing by-product (concrete dust) on the ground. Source control Best Management Practices (BMPs) are needed to prevent pH exceedance in discharges to groundwater.

Compliance Actions

- Immediately conduct housekeeping, and implement source control BMPs to prevent effluent violations.
- Submit a compliance report within 30 days of the inspection that explains the corrections made and re-sampling for pH effluent limits.

The following permit sections are provided for general guidance:

Runoff Conveyance and Treatment BMPs (Special Condition S.8 starting on page 26):

The Stormwater Pollution Prevention Plan (SWPPP) must include runoff conveyance and treatment BMPs as necessary to control pollutants and comply with the stormwater discharge limits in [S2](#) and [S3](#). (Refer to the Stormwater Management Manuals for additional information.)

Runoff conveyance BMPs include, but are not limited to:

1. Interceptor dikes
2. Swales
3. **Channel lining**
4. Pipe slope drains

Store unhardened concrete, any type of concrete solids (does not include fully cured or recycled concrete), returned asphalt, and cold mix asphalt on a bermed impervious surface. This includes comeback concrete, ecology blocks, septic tanks, jersey barriers, and other cast concrete products. Treat all stormwater that contacts these materials in a lined impoundment. Discharge of this water is subject to the effluent limitations in [S2](#) and must not cause a violation of water quality standards.

The Permittee must use **source control BMPs** in the following areas and during the following activities as necessary to control pollutants:

- a. Fueling at Dedicated Stations
- b. Mobile Fueling
- c. Loading and Unloading Areas
- d. Storage of Liquid in Permanent Above-ground Tanks
- e. Dust Control
- f. High Use Parking Areas
- g. Storage or Transfer of Solid Raw Materials, By-Products or Finished Products**
(See Volume IV in the SWMMWW/Chapter 8 in the SWMMEW for specific BMPs)

Discharges to Groundwater (Special Condition S.3.H on page 16):

The permittee is authorized to discharge process water, mine dewatering water, and stormwater to groundwater at the permitted location subject to the numeric effluent limitations in [S2](#) (**pH 6.5-8.5**) limit. If the Permittee combines discharges from two or more industrial activities, the most stringent effluent limit for each parameter applies.

1. There must be no visible oil sheen at any points of discharge to groundwater.

2. Any discharge to a pond, lagoon, or other type of impoundment or storage facility that is unlined is considered a discharge to groundwater and is subject to the groundwater quality standards ([Chapter 173-200 WAC](#)). **Water ponding at a facility can be considered a discharge to groundwater.**

Discharges to Groundwater (Special Condition S.4.B on page 17):

1. The Permittee must monitor all discharges of process water, mine dewatering water, Type 2 stormwater, and Type 3 stormwater to groundwater per S2.
2. The Permittee is required to representatively sample discharges to ground.

The Sand and Gravel Permit details a lined (impervious) surface as:

- Synthetic or flexible membrane material, not less than 30 mils thick (40 mils for new installations after the effective date of this permit), that must not react with the discharge.
- Concrete with a minimum thickness of six inches.
- Asphalt with a minimum thickness of six inches.
- Steel-walled containment tank.
- Any other functionally equivalent impoundment, structure, or technique that is based on standard engineering practices, and approved by Ecology to meet the intent of this section.

Permit Appendix-B Definitions

Representative Sampling means collecting an array of samples to accurately represent the nature of the discharge for parameters of concern. Many factors contribute to variability of pollutants in a discharge including quantity of water, time and date of sampling, and physical events and **location of discharge**.

Discharge Point means the location where a discharge leaves the Permittee's facility. **Discharge point also includes the location where a discharge enters the ground on-site.**

Discharge to Groundwater means the discharge of water into an unlined impoundment or onto the surface of the ground that allows the discharged water to percolate, or potentially percolate, to groundwater. Discharge to groundwater, discharge to land, and discharge to ground all have the same meaning.

If you have any questions or comments regarding this report or compliance with the permit, please contact me at eli.newby@ecy.wa.gov or at (360) 407-6292.

Richard Dickson

April 15, 2022

Page 4

Sincerely,

A handwritten signature in black ink that reads "Eli Newby". The signature is written in a cursive, flowing style.

Eli Newby
Sand and Gravel General Permit Manager
Southwest Regional Office
Water Quality Program

Enclosures: Water Quality Inspection Report, WAG501405; 2022-03-10
Photograph Log

cc: Paul Dickson, Dickson Company

Photograph Log



Photograph 1: Solid waste landfill operations and the main infiltration pond below.



Photograph 2: Accumulation of concrete fines from the crusher and concrete recycling operations.



Photograph 3: Drainage path of the concrete crushing and stockpile area runoff. I measured a pH of 10.78 in pooling water on the bare ground.



Photograph 4: Impoundment in bare ground where runoff from the concrete crushing and stockpile area is collected before being piped to the main infiltration pond. I measured a pH of 11.57 S.U. in this pond.



Photograph 5: Main infiltration pond - monitoring point SP2, I measured a pH of 9.07 S.U. The pump was not running and surface water discharge was not occurring during the inspection.



Photograph 6: The site map pond 7 and pond 9 are currently joined as a single main infiltration pond.