



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office

PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

October 21, 2022

Janis Kristiansen
Western Wood Preserving Company
PO Box 1250
Sumner, WA 98390

Re: NPDES Permit No. WA0040738 Inspection Report

Dear Janis Kristiansen:

Thank you for your time during our inspection of your Sumner facility on September 27, 2022. I am sending you a copy of our inspection report in reference to your NPDES Permit (No. WA0040738) for your review and files.

If you have any questions regarding this inspection report, please email me at john.diamant@ecy.wa.gov or call me at (360) 819-3824. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "John Y. Diamant".

John Y. Diamant, P.E.
South Puget Sound Basin
Industrial Facility Manager
Southwest Region Office
Water Quality Program

Enclosures: NPDES Permit No. WA0040738 Inspection Report
Photo Log

cc: Steve Eberl, Ecology
Stephanie Heiges, Ecology
Jonathan Drygas, Ecology
Kamren Moen, Ecology

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	5	W	A	0	0	4	0	7	3	8	2	2	0	9	2	7	C	S	2											
Remarks																															
21																															
Inspection Work Days										Facility Self-Monitoring Evaluation Rating										B1		QA		-----Reserved-----							
67	1	69	70										4	71	N	72	N	73	74	75	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> Western Wood Preserving Company 1313 Zehnder Street Sumner, WA 98390	Entry Time/Date 12:11 hours 09/27/2022	Permit Effective Date September 1, 2021
	Exit Time/Date 13:14 hours 09/27/2022	Permit Expiration Date August 31, 2026
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number Janis Kristiansen Environmental Coordinator ph: (253) 863-8191 fx: (253) 863-9129	Other Facility Data <i>(e.g., SIC NAICS, and other description information)</i> Washington Tracking Network Environmental Health Disparity Rank: 8	
Name, Address of Responsible Official/Title/Phone and Fax Number Ms. Janis Kristiansen (as shown above)	Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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

<input type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Stormwater	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

Summary of Findings

John Diamant, Jonathan Drygas, and Kamren Moen (Department of Ecology (Ecology) staff) conducted this compliance inspection. Ecology staff entered the facility at 12:11 hours. The weather was sunny.

This inspection was pre-scheduled with Janis Kristiansen. The site inspection started out with a short meeting in the facility's conference room. During the meeting, we discussed changes that occurred since the last inspection. No changes were noted. Western Wood Preserving Company's (WWPC's) production has been steady. Currently, WWPC uses copper azole, CCA (for industrial uses), borate, and fire-retardant stains. None of the operations has changed.

John asked what WWPC's plans were to improve their BMPs and/or treatment system. John mentioned the pond could be baffled to maximize treatment through it. (An engineer should be hired to evaluate any improvements to the treatment system). Or finding additional BMP, maintenance, or operational improvements might be sufficient to meet the final permit limits. John stated that now is the time to begin exploring these issues. Janis stated that they would begin to think about these things.

After our inspection meeting, we went on-site for the walk-through portion of the inspection. The photos attached to this inspection report provide references for what was observed at the site. The facility appeared to have excellent housekeeping and all vital components of the facility seemed to be in good working order. The site grounds were extremely clean and orderly, and it seemed that all of the treated lumber that was stored outside was wrapped appropriately. All best management practices appeared to be implemented **very well**. There appeared to be a high level of

management and awareness of all wastestreams from the facility. The personnel seemed to be attentive and responsive. This was very encouraging, and the facility should be lauded for their accomplishments in these areas and for consistently maintaining this high level of care towards managing their storm water throughout the years. Because there isn't an active storm water treatment system on-site, pollutants are managed nearly entirely **through the use of BMPs**, their bioswale, and their bio-retention pond.

The bioswale and bio-retention pond is maintained regularly to maintain functionality. WWPC is still recycling as much stormwater as possible for generating their make-up water. This is a win-win for WWPC since they save money on purchasing City water. Ecology commends WWPC for their water conservation and hopes that WWPC will continue to consider new environmentally protective conservation measures.

No concerns were noted by Ecology inspectors at this time.

Recommended Actions

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

The Permittee shall: 1) continue following the requirements set in the NPDES Permit; and 2) notify the Department of any concerns and/or spills, bypasses, and violations which may occur.

Verify Latitude and Longitude

☒ Announced
☐ Unannounced

Front Door: Latitude: 47.20745° N Longitude: 122.23852° W
Outfall 001: Latitude: 47.20915° N Longitude: 122.23817° W
Outfall 002: Latitude: 47.20950° N Longitude: 122.23584° W

Name(s) and Signature(s) of Inspector(s)

John Y. Diamant, P.E.



Agency/Office/Phone Number

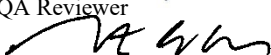
Ecology/SWRO (360) 819-3824

Date

10/21/2022

Signature of Management QA Reviewer

Steven G. Eberl, P.E.



Agency/Office/Phone Number

Ecology/SWRO (564) 999-3584

Date

10/21/2022

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 – third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (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	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge – Biosolids	{	Stormwater-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Stormwater-Construction-Non-Sampling
F	Pretreatment Follow-up	\$	Combined Sewer Overflow-Non-Sampling	:	Stormwater-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Stormwater-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Stormwater-MS4-Sampling
M	Multimedia	\	CAFO-Sampling	-	Stormwater-MS4-Non-Sampling
N	Spill	=	CAFO-Non-Sampling	>	Stormwater-MS4-Audit
O	Compliance Evaluation (Oversight)	2	IU Sampling Inspection		
P	Pretreatment Compliance Inspection	3	IU Non-Sampling Inspection		
R	Reconnaissance	4	IU Toxics Inspections		
S	Compliance Sampling	5	IU Sampling Inspection With Pretreatment		
		6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics With Pretreatment		

P

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

A - State (Contractor)	O - Other Inspectors, Federal/EPA (Specify in Remarks columns)
B - EPA (Contractor)	P - Other Inspectors, State (Specify in Remarks columns)
E - Corps of Engineers	R - EPA Regional Inspector
J - Joint EPA/State Inspectors-EPA Lead	S - State Inspector
L - Local Health Department (State)	T - Joint State/EPA Inspectors-State Lead
N - NEIC Inspectors	

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.
- 5 - Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389

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.

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.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K-CAFO, V-SSO, Y-COS, W-Stormwater, 9-MS4. States may also use the new wet weather CAFO and MS4 inspection types shown in column 19 of this form. The EPA regions are required to use the new wet weather CAFO and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

PIMS Photo Export

Description	Photographs	Image Name
Manhole containing Outfall 001.	 Ctrl+Click HERE to view full size image	WESTERN WOOD PRESERVING CO
Stormwater pond.	 Ctrl+Click HERE to view full size image	WESTERN WOOD PRESERVING CO

<p>Flowmeter.</p>	 <p>Ctrl+Click HERE to view full size image</p>	<p>WESTERN WOOD PRESERVING CO</p>
<p>Stormwater pond.</p>	 <p>Ctrl+Click HERE to view full size image</p>	<p>WESTERN WOOD PRESERVING CO</p>
<p>CBs have filter fabric inserts.</p>	 <p>Ctrl+Click HERE to view full size image</p>	<p>WESTERN WOOD PRESERVING CO</p>

<p>Outfall 002 - Bioswale</p>	 <p>Ctrl+Click HERE to view full size image</p>	<p>WESTERN WOOD PRESERVING CO</p>
<p>Clean yards.</p>	 <p>Ctrl+Click HERE to view full size image</p>	<p>WESTERN WOOD PRESERVING CO</p>