STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Southwest Region Office
PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

June 1, 2023

Richard Dickson
PO Box 110880
7554 185th Avenue NE, Suite 100
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 Dickson Company - Waller Rd Pit (Facility) on May 18, 2023. 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

pH sampling was conducted at the main infiltration pond (monitoring point SP2) and found to be within the 6.5-8.5 permit limits. No oil sheen was observed in the Vac-Truck pond (monitoring point SP3) during the inspection. Steps have been taken by Dickson Company to collect concrete recycling related storm water runoff on asphalt and contain the runoff in a lined pond for treatment. The CO2 sparging treatment system has not yet been installed.

After installation of the pH treatment system, a wet season inspection should be conducted to evaluate the conveyance of all high pH stormwater to the new treatment system. As concrete stockpiles shrink in size, additional asphalt impervious surface may be needed to effectively collect and convey all high pH stormwater away from bare ground and into the treatment system.

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.

The following information is included for guidance:

Permit Condition S.3 (Discharge Limits):

A. Best Management Practices (BMPs)

1. The Permittee must implement *Best Management Practices (BMPs)* as necessary to provide *All Known, Available, and Reasonable methods of prevention, control, and*

Treatment (*AKART*). And implement any additional BMPs as necessary to comply with state water quality standards.

2. The Permittee must inspect, maintain, and repair all BMPs to ensure continued performance of their intended function.
3. Stormwater BMPs must be consistent with one of the following conditions:
    a. The *Stormwater Management Manual for Western Washington* (SWMMWW), for *sites* west of the crest of the Cascade Mountains.
    b. The *Stormwater Management Manual for Eastern Washington* (SWMMEW), for sites east of the crest of the Cascade Mountains.
    c. Other *equivalent stormwater management guidance documents* which have been subject to public review and comment and approved by Ecology.
    d. Documentation in the SWPPP that the BMPs selected provide an equivalent level of *pollution* prevention, compared to the applicable *Stormwater Management Manual*, including:
        i. The technical basis for the selection of all stormwater BMPs (scientific, technical studies, and/or modeling) which support the performance claims for the BMPs being selected.
        ii. An assessment of how the selected BMP will satisfy AKART requirements and the applicable federal technology-based treatment requirements under *40 CFR* part 125.3.

B. Not Cause or Contribute to a Violation of Standards

Discharges must not cause or contribute to a violation of: *Groundwater Quality Standards* (Chapter 173-200 WAC), *Surface Water Quality Standards* (Chapter 173-201A WAC), or *Sediment Management Standards* (Chapter 173-204 WAC) of the State of Washington; and 40 CFR 131.

C. Maintenance Shop Zero Discharge

No wastewater shall be discharged to surface water or groundwater from a maintenance shop unless all of the following criteria apply:

1. The maintenance shop exists at the time permit coverage begins.
2. A discharge to sanitary sewer is not available.
3. Adequate treatment before discharge is provided.
4. The discharge will not cause or contribute to a violation of the surface water or ground water quality standards.

D. Unauthorized Use of Site

The Permittee must maintain and manage permitted sites to prevent unauthorized activities such as illegal dumping, spilling, or other misuse of the site that could discharge pollutants to waters of the State. Appropriate site management may include, but is not limited to, visual inspections, signage, and physical security measures.

E. Water Management

1. Any ditch, channel, or other Best Management Practices (BMPs) used for routing water must be designed, constructed, and maintained to contain all flows except when:
    a. Designed to infiltrate *Type 1 stormwater*.
    b. Precipitation exceeds the *design storm* (*10-year, 24-hour event*).
2. Lined *Impoundment* Required

This permit prohibits the direct discharge of process water from Concrete Batch Plants (NAICS 327320) and Asphalt Batch Plants (NAICS 324121), including any wastewater from truck wash-out areas, except to a lined impoundment. The lined impoundment must have adequate structural load-bearing design to support any mechanical method used for sludge removal and must be maintained to prevent any *discharge to groundwater*. After treatment, the Permittee may discharge wastewater subject to the limits set forth in Conditions S2 and other parts of this section (S3). At a minimum, the lined impoundment must meet one of the following design standards.

The Liner must be constructed of:

a. 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.
b. Concrete with a minimum thickness of 6 inches.
c. Asphalt with a minimum thickness of 6 inches.
d. Steel-walled containment tank.
e. 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.

3. Impoundment Capacity

Any impoundment must have adequate capacity to provide treatment for water quality and flow control of wastewater. The design storm for calculating the size required for the impoundment is the 10-year, 24-hour precipitation event.

4. The Permittee must inspect the structural integrity of a lined impoundment whenever sludge removal occurs and, before refilling, make any repairs necessary to ensure that the lined impoundment functions to prevent discharges as intended. Continuous removal systems must draw down the impoundment periodically for inspection.
5. Mined Pit Pond

Discharges to a mined pit pond are not required to comply with TSS and turbidity limits prior to final reclamation. When reclamation is complete, discharges to the pond must not cause or contribute to a violation of surface water quality standards (Chapter 173-201A WAC).

6. The Permittee must not discharge Type 3 stormwater from an asphalt plant, concrete batch plant, asphalt release agent application area, or concrete truck washout area into a pit or excavation that penetrates the water table.

F. <u>Use of Chemical Treatment Products</u>

1. Document Use - The Permittee, upon *application* for coverage under this permit must document the use of any chemical treatment additives or soil *stabilization* polymers used to:
   a. Treat water discharged to waters of the State.
   b. Stabilize soils.
   c. Suppress dust.

   Documentation must identify the chemicals used, their commercial source, the Safety Data Sheet, and the application rate. The Permittee must retain this information on site or within reasonable access to the site and make it immediately available, upon request, to Ecology. The Permittee must notify Ecology prior to use of any new chemicals discharging to surface waters or of any significant change in application rates of chemicals discharging to surface waters.
2. Apply as Instructed by the Manufacturer – The Permittee must apply chemicals used to enhance solids settling before discharge to waters of the State, to stabilize soils, or abate dust according to the manufacturer's instructions and may only use a chemical if the toxicity to aquatic organisms is known. The Permittee may only use chemicals to stabilize soils if the stormwater from the chemical application area is routed to and treated by a stormwater detention pond.
3. The Permittee must not use ligninsulfonate for dust suppression in excavated areas, including areas where topsoil has been removed.
4. Additional Restrictions – In addition, chemical treatment/soil stabilization must meet one of the following conditions. It must:
   a. Be consistent with the Stormwater Management Manuals.
   b. Be consistent with other methods approved per the Chemical Technology Assessment Protocol – Ecology (C-TAPE) program.
   c. Use chemical treatment additives at a dosing rate resulting in no toxicity in the effluent or stormwater discharge.

2019 Stormwater Management Manual for Western Washington (SWMMWW) BMP C252: Treating and Disposing of High pH Water: 2019SWMMWW - FrontCover (wa.gov)

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) 763-2633.

Sincerely,

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

Enclosures: Water Quality Inspection Report -WAG501405
2022-05-18 Photograph Log

cc: Paul Dickson, paul@dickson.net

EPA

United States Environmental Protection Agency
Washington D.C. 20460

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|G| 501405 | |	| 2023 | 05 | 18|	|C|	|S|	|2|

Remarks

21 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	B1	QA	Reserved
67 | |1| | 69	70 |3|	71 |N|	72 |N|	73 | | | 74 75 | | | | | | | | | 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
Dickson Company - Waller Rd Pit
2839 48th Street Northeast
Tacoma, WA 98422

Entry Time/Date	Permit Effective Date
12:10 p.m. 05/18/2023	12/06/2022
Exit Time/Date	**Permit Expiration Date**
1:40 p.m. 05/18/2023	03/31/2026

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number
Paul Dickson, Delegated Signer, (253) 472-4489

Name, Address of Responsible Official/Title/Phone and Fax Number
Richard Dickson
PO Box 110880
7554 185th Avenue Northeast, Suite 100
Tacoma, WA 98411-0880

Contacted: ☐ Yes ☒ No

Other Facility Data *(e.g., SIC NAICS, and other description information)*

Operation Status: Active

NAICS: 212321, 212399, 327999, ECY001, ECY002

Env Health Disp. Rank: 8

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

☒ Permit	☒ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☐ **Records/Reports**	☒ Compliance Schedules	☒ Pollution Prevention	
☒ Facility Site Review	☐ Laboratory	☒ Stormwater	
☒ Effluent/Receiving Waters	☒ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☒ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

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

Eli Newby and Eric Daiber conducted an inspection of the Dickson Company - Waller Rd Pit (Facility) on May 18, 2023. The inspection was conducted with Paul Dickson present. Please read the accompanying cover letter for additional information. During this inspection the following areas and conditions were observed:

- The weather condition during the inspection was sunny and roughly 78 degrees Fahrenheit.
- An asphalt roadway with bermed edges has been constructed where concrete recycling stormwater runoff drains toward a lined containment pond.
- The Site Management Plan was reviewed during the inspection and requires updates for the lined conveyance, lined containment, and treatment for high pH concrete recycling runoff.
- The infiltration pond was not being pumped to the surface water outfall during the inspection.
- The use of any chemical treatment additives or soil stabilization polymers used on site is subject to permit condition S.3.F.
- The Permittee must notify Ecology prior to use of any chemicals discharging to surface waters or of any significant change in application rates of chemicals discharging to surface waters.

Verify Latitude and Longitude
47.2168579101563, -122.390502929688

☒ Announced
☐ Unannounced

Name(s) and Signature(s) of Inspector(s):	Agency/Office/Phone and Fax Numbers	Date
Eli Newby Eric Daiber	Ecology/SWRO (360) 763-2633	5/24/2023
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax numbers**	**Date**
Jacek Anuszewski, P.E. **for Steven G. Eberl, P.E.**	J. Anuszewski, Ecology/SWRO (360) 628-3657 Steven G. Eberl, Ecology/SWRO (564) 999-3584	6/1/23

Photograph Log

Photograph 1: Vac-Truck infiltration pond with no oil sheen observed during the inspection (47.21514, -122.39301).

Photograph 2: Asphalt lined drainage path for concrete recycling related stormwater runoff (47.21681, -122.39281).

Photograph 3: Asphalt drainage path for concrete recycling related runoff (47.21683, -122.39149).

Photograph 4: Lined holding pond for concrete recycling related stormwater runoff (47.21697, -122.39118).

Photograph 5: pH treatment tank awaiting a CO2 treatment system installation (47.21694, -122.39107)

Photograph 6: Culvert outfall location for the lined treatment system where pH sampling should be conducted at the point of compliance (47.21698, -122.39093).