

Permit Compliance Inspection Report

Water Quality Program

Northwest Region Office

A. General Information

Facility Name & Address: Old Mill Site Port Gamble
Rainier Ave
Port Gamble, WA 98364

Permit Type: Industrial Stormwater General Permit Permit Number: WAR008736

Permit Effective Dates: 01/01/2020 to 12/31/2024

Permit Type: Construction Stormwater General Permit Permit Number: WAR304947

Permit Effective Dates: 01/01/2021 to 12/31/2025

Date of Inspection: November 14, 2024

Inspection Duration: 12:30 PM to 2:30 PM

Discharge to: Surface Water

Receiving Water: Port Gamble Bay and Puget Sound

Type of Inspection: Announced

Weather: Compliance Inspection - Without Sampling
Cloudy, Precipitation at times, Lower 40's F

Photographs Taken: ☒ Yes ☐ No Samples Taken: ☐ Yes ☒ No

B. Personnel Information

Ecology Representative(s): Evan Dobrowski (Lead Inspector)

Facility Representative(s): Stephanie Foster
Email: stephanie.foster@raydient.com

Responsible Party/Official: Jaime Northrup
1 Rayonier Way
Yulee, FL 32097
Phone: 904-699-8686 Email: jaime.northrup@rayonier.com

Inspector Signature(s)

Evan Dobrowski

December 16, 2024

Evan Dobrowski
Industrial Stormwater Inspector and Compliance Specialist
Water Quality Program

Date

Facility Description & Background

Old Mill Site Port Gamble is covered under Ecology's Industrial Stormwater General Permit (ISGP) permit number WAR008736. This facility has been under permit since January of 2010. Under the ISGP the facility has not taken a stormwater sample since 2014 in violation of permit requirements. The facility turned in a Notice of Termination form and this inspection was in response to this termination request.

Port Gamble Bay Cleanup Staging Site is covered under Ecology's Construction Stormwater General Permit (CSWGP) permit number WAR304947. The site has been permitted since January of 2017. The site has documented no discharge since permit inception. The Notice of Intent documented that contaminated soils did exist but would not be disturbed under this permit.

C. Inspection Narrative & Observations

1. Permit Documentation and Records Review

During the site inspection documents were not available for review. Documents were requested to be sent via e-mail since they were not available during the site visit. As of the date this inspection report was written no site SWPPP, sampling results, etc. have been sent.

2. Site Walkthrough

During the site inspection I met with Stephanie Foster with Rayonier the property owner and permit holder. The original intention of the visit was to conduct a Termination inspection under the Industrial Stormwater General Permit. However, upon walking down to the site from the parking area it was found the site was under construction.

We found the site with entirely bare ground except a few locations of asphalt and concrete, many uncovered stockpiles of soil as well as stockpiles of refuse/debris. Stephanie explained that the site was undergoing a contaminated site cleanup. At the time of my visit, I was unaware the site did not have an administrative order allowing the discharge of potentially contaminated stormwater. I explained to Stephanie that stockpiles needed to be covered and unworked soils needed to be covered as well. The construction site included regrading of the shoreline and silt fence was placed roughly at the hightide line.

During the site walk we found one roughly 6-inch concrete pipe in the ground at the edge of the beach regraded sand with roughly one-foot deep rilling present, the rilling stopped at the pipe. The pipe was not full of water or silt. I explained this indicates stormwater flowed down that pipe and discharged and that would be a location that needs to be sampled. Around this pipe was a ditch directing water to pool above the pipe. Further along the site walk we came to a concrete slab covering a stormwater structure. I was able to hear water flowing into the structure and again explained this is also a location that should be sampled. I then asked who the CESCL for the CSWGP project was; Stephanie explained that would be Seton construction and we found two Seton staff onsite one was an excavator operator, and one was the site assigned CESCL.

The CESCL for the site explained he was unaware of both discharge locations and the excavator operator explained he was unaware of the pipe at the beach line but was aware of the concrete slab as he placed it

over the stormwater structure a week prior to avoid someone potentially falling in. I asked if he had documented the structure on the site map, in the Stormwater pollution prevention plan (SWPPP), and if the discharge locations had been sampled. The two Seton staff explained that the discharge locations were not documented and explained they believed everything infiltrated. I asked what documentation is present to indicate these two stormwater conveyance locations go to an infiltration location and do not discharge and the explanation that was provided was the regrading of the beach and that I would need to talk to Anchor QEA as they would know best. I asked if pipes were found during the regrading and if those pipes were properly decommissioned and was told the project was too large to focus on any infrastructure that was found, and it was assumed anything in the ground was just old fill material. After discussing this issue in depth, I explained that I expected to see sample results of the stormwater that flowed into these stormwater conveyance structures in the data monitoring reports submitted to Ecology. After this we continued to walk the site and found an area where a mobile fuel tank was setup. A spills kit was present, but drip pans were not present in the area. We continued walking toward the area where the excavator operator was working near the entrance to the sites gated area. In this area there was a wheel wash setup however, I was told the wheel wash was not being used for trucks that day as they were staying on the quarry spalls. The quarry spill entrance was in good condition but did not appear to be installed per the BMP manual with filter fabric below as mud was coming up through some areas of the quarry spalls. Outside of the fenced perimeter but inside the silt fence perimeter was a large asphalt area where the job shack was. In this location there are at least two catch basins covered with cones and had some rubber placed over the catch basin cover. At the first catch basin I could hear water flowing into the catch basin and I explained the rubber will not stop water once it is over the outlet because it is not a watertight plug. This catch basin or the outfall needs to be sampled and monitored closely to verify when discharges are occurring. After this site visit, I referred the site to the CSWGP manager Charles Hackel with Ecology. I explained to Stephanie that the ISGP could not be terminated until the refuse/debris piles were removed. During the site walk I also requested the site SWPPP for the ISGP. Stephanie explained she does not have it and does not know where it is but she can find it and send to me. I requested that it get sent via e-mail and as of the writing of the inspection report I have not received the SWPPP.

D. Corrective Actions Required for Compliance

- **Violation:** In accordance with **permit condition S4.B.3.a**, The Permittee shall sample each distinct point of discharge off-site except as otherwise exempt from monitoring as a substantially identical discharge point...
 - In the case of Old Mill Site Port Gamble, the facility has documented no discharge for many quarters and has no less than two distinct discharge points that were found during the inspection. These locations need to be added to the site map and sampling needs to begin immediately. Within 30 days of receipt of this inspection report, submit a sample point update form to Ecology adding these two locations as sample points and immediately begin sampling at these locations a minimum of once per quarter when discharges occur or more frequently if operations fall under the CSWGP.
- **Violation:** In accordance with **permit condition S3.B.1.a-p**, The SWPPP shall contain a site map...The site map shall identify: a- p
 - In the case of Old Mill Site Port Gamble, the facility does not appear to have a site map developed. Within 45 days of receipt of this inspection report, have the stormwater conveyance system surveyed to determine proper conveyance piping and then develop a site map within 60 days.

- **Violation:** In accordance with **permit condition S3.B.4.b.i.2.d**, The Permittee shall...keep all dumpster under cover or fit with a storm resistant lid that must remain closed when not in use. (Tarps are not considered storm resistant.)
 - In the case of Old Mill Site Port Gamble, the facility had several locations where dumpsters without lids or lids that were not closed and not in use were documented. Within 30 days of receipt of this inspection report, review permit condition S3.B.4.b.i.2.d and begin maintaining dumpsters with storm resistant lids that are closed when not in use.

If you have any questions or concerns regarding this inspection report, please contact Evan Dobrowski at 425-213-4230 or evan.dobrowski@ecy.wa.gov.

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Photo 1 [IMG_2330]

Description: *Photo showing view of site from View Dr NE*

Photo 2 [IMG_2331]

Description: *Photo showing gate around contaminated site area, dumpster with wood debris, uncovered stockpiles, and large ponding areas.*



Photo 3 [IMG_2332]

Description: *Photo showing silt fencing near high tide mark based on wrack height.*

Photo 4 [IMG_2333]

Description: *Photo showing silt fencing near high tide mark based on wrack height.*



Photo 5 [IMG_2334]

Description: *Photo showing silt fencing, bare soils, and uncovered stock piles.*



Photo 6 [IMG_2335]

Description: *Photo showing water flowing with a sheen present towards the pipe shown in photo 7.*



Photo 7 [IMG_2336]

Description: *Photo showing roughly 6-inch concrete or tile pipe with rilling/erosion present stopping at the pipe. Rilling roughly one foot deep.*



Photo 8 [IMG_2337]

Description: *Photo showing roughly 6-inch concrete or tile pipe with rilling/erosion present stopping at the pipe. Rilling roughly one foot deep.*



Photo 9 [IMG_2338]

Description: *Photo showing concrete slab covering a stormwater conveyance structure.*



Photo 10 [IMG_2339]

Description: *Photo showing ponding water that is flowing into the stormwater conveyance structure covered by the concrete slab in photo.*



Photo 11 [IMG_2340]

Description: *Photo showing white pipe to convey water from one side of roadway towards the other side of roadway closer to the beach.*



Photo 12 [IMG_2341]

Description: *Photo showing parked excavator, bare soils, and ponding water.*



Photo 13 [IMG_2342]

Description: Photo showing ponding water near the 6-inch pipe shown in photo 7 and silt fencing/beach sand adjacent to the pipe.



Photo 14 [IMG_2343]

Description: Photo showing the 6-inch pipe and rilling/erosion shown in photo 7 and beach sand adjacent to the pipe.



Photo 15 [IMG_2344]

Description: Photo showing ditch dug directing flow toward the pipe shown in photo 7.



Photo 16 [IMG_2345]

Description: Photo showing mobile fuel trailer with spill kits present.



Photo 17 [IMG_2346]

Description: Photo showing concrete infrastructure filled with stormwater no information on depth available.



Photo 18 [IMG_2347]

Description: Photo showing entrance/exit of contaminated zone of construction site. Wheel wash present but not on at the time.



Photo 19 [IMG_2348]

Description: Photo showing concrete and wood debris pile with excavator staged for loading operations.



Photo 20 [IMG_2349]

Description: Photo showing traffic cone over catch basin with rubber pad over catch basin. Heard stormwater flowing into this catch basin at time of visit.



Photo 21 [IMG_2350]

Description: *Photo showing area around catch basin shown in photo 20. Job shack and staging of materials present.*