

Permit Compliance Inspection Report

Water Quality Program

Bellingham Field Office

A. General Information

Facility Name and Address: Burlington Lumber Facility
14353 McFarland Rd
Mount Vernon, WA 98273

GPS Latitude/Longitude: 48.447132, -122.434501

Permit Number: WAR007765

Permit Type: Industrial Stormwater General Permit

Permit Effective Dates: January 1, 2025 to December 31, 2029

Inspection Date and Time: April 22, 2025, 12:50 PM to 4:45 PM

Discharge to: Surface water

Receiving Water: Big Indian Slough

Type of Inspection: Announced
Compliance Inspection - With Sampling

Weather: Sunny, 55°F

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

B. Personnel Information

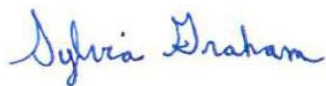
Ecology Representatives: Sylvia Graham (Lead Inspector)
Matt Colston, TMDL Lead
Kaylin Gentz, Non-Point Specialist

Other: Jamie Halpin, Source Control Inspector, Skagit County Public Works

Facility Representative(s): Justin Eastman, Environmental Coordinator
Email: JEastman@spi-ind.com Phone: (360) 483-7442
Tony Minor, Safety Coordinator
Email: tminor@spi-ind.com Phone: (360) 424-7619
Tyler Moriarty, Cogeneration Plant Operator
Email: tmoriarty@spi-ind.com

Responsible Party/Official: Scott North, Facility Manager
14353 McFarland Rd
Mount Vernon, WA 98273
Email: SNorth@spi-ind.com Phone: (360) 424-7619

Inspector Signature



6/3/2025

Sylvia Graham

Date

Stormwater Permit Manager

C. Facility Description and Background

Burlington Lumber Facility (facility) is conditionally authorized to discharge stormwater to surface water under Industrial Stormwater General Permit (ISGP) No. WAR007765. The ISGP is a National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge Permit. The facility is a sawmill operating under North American Industry Classification System (NAICS) code 321113. The facility is conditionally authorized to discharge stormwater at monitoring points SWS1 and SWS2. The purpose of this inspection was to conduct a routine compliance inspection. This is the first ISGP inspection of the facility by the Washington State Department of Ecology (Ecology) on record.

D. Inspection Narrative and Observations

1. Permit Documentation and Records Review

Ecology arrived on site at 12:50 pm and met with facility staff in the office to review permit documentation. The facility had on site their ISGP coverage letter, monthly site inspection reports, sampling analytical reports, EHS meeting rosters for training sessions, and Stormwater Pollution Prevention Plan (SWPPP). Following the inspection, Justin Eastman emailed me copies of invoices for sweeping and vector services, calibration logs, analytical reports, and training materials.

My comments for the SWPPP are as follows, which may not be a comprehensive list of edits needed:

- Revise wash racks to discharge to POTW rather than closed loop
- Overflow from Pond 1: there are three versions of where an overflow goes in the SWPPP (p. 22, 28, and another I didn't write down). You stated you don't think it would overflow, and I didn't see an obvious overflow location during the inspection.
- Check the frequency stated for cleaning out catch basins and vaults
- Remove the sample point SWS1, and clarify samples are taken at the locations DP1 and DP2. The sample point names on the site map should match those in the ISGP coverage letter.
- Specify you measure pH yourselves with a calibrated pH meter.
- Section 5.4: use the NWRO Shoreline Office number, which is 24/7: 206-594-0000 (not the 360 number)
- P.8 states, "CBs in vicinity of outdoor storage tanks are not connected to the SW line". If this is true, these should be clearly marked on the site map, and describe where they go, if not storm.

I observed two instances where the sample results submitted in the discharge monitoring report (DMR) did not match the results in the analytical report. For the sampling event on 10/4/2024, the results for zinc in the analytical report were 387 and 289 ug/l for SWS1 and SWS2, respectively, while the results in the DMR were 106.53 and 95.6 ug/l for the two points, respectively. Submitting false information in a DMR is a violation of ISGP Condition S9.B.

2. Site Walkthrough

Following review of permit documentation, we walked throughout the main yard and observed the following:

- Multiple containers of chemicals and petroleum products stored outside without cover or secondary containment (Photos 1-13). One international bulk container (IBC) tote in the eastern equipment storage yard was missing the entire top and it was full of brown liquid (Photos 11-12).
- Much of the main yard was well swept, but a few areas had significant accumulated saw dust, wood chips, and sediment, including north of the Fuel House (Photos 14-16), around a catch basin in the south of the main yard (Photo 17), and on McFarland Road at the northeast side of the site (Photo 18).
- The Fuel House walls on the north side of the building had multiple gaps and, on the east side, one panel was completely missing, allowing significant hog fuel to escape the building and accumulate outside to the north of the building (Photos 19-20). A wooden fence on the north side of the chip pile was broken, allowing hog fuel to accumulate on the ground north of the fence (Photo 21).
- A few tears and gaps in the debris netting along the north side of the railroad at the north site boundary.
- Multiple instances of leaks and spills onto the ground that had not been cleaned up:
 - Two dark stains on the ground in the western gravel equipment storage yard, one of which was under an air compressor (Photos 22-23).
 - Multiple small spills on concrete next to the diesel storage area in the southeast of the facility (Photo 24).
- There were no drip pans located next to either fueling area.
- Multiple dumpsters lacking solid cover or storm-resistant lids (Photos 25-27).
- Uncovered storage of tires outside the truck shop (Photo 28). Justin said they were working on a solution to address tires under the new 2025 ISGP requirement.
- A catch basin with significant wood waste accumulated around and on top of the grate, located at the southeast corner of the northeast chip pile (Photo 29).
- Areas of exposed soil at the northwest corner of the stormwater pond (Photos 30-31). The ditch north of the pond had overtopped the berm between it and the stormwater pond during this past winter and the exposed soil was not stabilized following repair of the berm
- The ditch north of the pond flows south around the west side of the pond and under the facility, and discharges at DP2. Stormwater from the southwest corner of the facility joins this piped conveyance just north of the rail tracks. The discharge at DP2 is comingled stormwater from the facility and other facilities and roadways to the north; therefore, the facility should change this sample point to the first catch basin upstream of where it joins the conveyance from the ditch, so samples are not comingled.
- Some debris scattered on the ground in the eastern equipment storage yard, including building insulation (Photo 32).

- Uncovered stockpiles of soil and concrete and asphalt rubble east of the eastern rail tracks (Photo 33). This material is from prior construction projects at their site. This area is not part of the permitted facility or shown on the site map.

We walked to both sample locations, DP-1 and DP-2, which both discharge south of the facility into Big Indian Slough. Both locations were discharging at the time of inspection and I took samples to measure turbidity. My readings were 20.2 and 9.05 NTU, respectively, both under the ISGP benchmark.

All photos taken by Sylvia Graham on day of inspection unless otherwise noted.

On 4/25/2025, Justin emailed photos of corrective actions made to date. The corrected items are noted in the next section.

E. Corrective Actions Required for Compliance

- 1) Provide cover and secondary containment for all chemical containers stored outside, as well as inside where a leak or spill could flow outside through a doorway, or get tracked out by equipment, in accordance with ISGP Condition S3.B.1.4.b.i.4.
 - Properly manage and/or dispose of liquids in the totes in the east laydown yard.
 - In the diesel/gas/oil storage area, modify the steel platform on both sides so that a leak or spill would flow into the containment instead of off the side.
 - The facility sent photos of this correction on 4/25/2025.
- 2) Place drip pans at all fueling locations. Train staff to use drip pans during all petroleum transfer operations in accordance with ISGP Condition S3.B.4.b.i.4.f.
 - The facility sent photos of this correction on 4/25/2025.
- 3) Clean up spills/leaks immediately in accordance with ISGP Condition S3.B.4.b.i.3.d, including the stains on the ground in the east equipment storage yard and on the concrete next to the diesel storage area. For the spills to ground, follow the guidance in Ecology's [Small Spills to Soil](#) focus sheet, sent with this report.
 - Equipment and parts stored outside must be drained before storage. If there is any potential oil residue, store under cover and containment.
 - The facility sent photos of this correction on 4/25/2025.
- 4) Implement and maintain good housekeeping in accordance with ISGP Condition S3.B.4.b.i.2, including the following:
 - Repair the north and east sides of the Fuel House and nearby wood fence to eliminate hog fuel from escaping the area.
 - Maintain facility buildings and fencing to prevent the escape of wood chips, saw dust, etc.
 - Increase sweeping north of the Fuel House and a few other spots with accumulated sediment and saw dust noted in this report.
 - Clean up solid waste in the east yard, such as insulation and pieces of plastic sheeting.
 - The facility sent photos of this correction on 4/25/2025.

- Move all tires under cover and up off the ground.
 - The facility sent photos of this correction on 4/25/2025.
- 5) Stabilize all the exposed soil in the NW corner of the pond such as seeding, netting/blankets, mulch, etc. in accordance with ISGP Condition S3.B.4.b.v and erosion control options described in the [Stormwater Management Manual of Western Washington](#).
 - The facility sent photos of temporary stabilization on 4/25/2025, which is adequate for short-term stabilization. The facility should plan to implement permanent stabilization, such as seeding grass.
- 6) Cover all dumpsters (for solid waste, recyclables, scrap metal, etc.) in accordance with ISGP Condition S3.B.4.b.i.2.d. Covers may be open during use, but must be closed at the end of the day.
- 7) Implement and maintain source control BMPs in accordance with ISGP Condition S3.B.4.b.i.3, including:
 - Install protection around catch basins around the Chip Pile so they don't get inundated with chips and sediment.
 - Repair the few sections of debris fencing along the north boundary that were torn and not functional.
- 8) Confirm the manhole just south of the pond outlet is an oil water separator. The Utility Map does not show an oil/water separator there. If it's just a manhole, update the site map accordingly.
- 9) If you wish to use boiler ash in your pond, please complete and submit this [Request for Chemical Treatment](#). If you won't use it again, please remove any reference to this in your SWPPP.
- 10) Submit an [Update Form](#) to do the following:
 - Change sample location DP2 to remove comingling with offsite stormwater (this does not require public notice).
 - Update permit contacts.
- 11) Confirm the discharge location from the eastern equipment storage area. If this area discharges offsite, or to a stormwater conveyance that does not flow to an existing sample point, add a new sample point for this yard.
- 12) For the stockpiles of concrete and asphalt rubble and fill material east of the facility:
 - It's best to remove the concrete and asphalt rubble. If you hire a portable crusher to process this material, confirm the operator has an active Sand & Gravel General Permit. If you wish to keep this material or receive additional concrete and asphalt rubble, contact the Skagit County Public Health Department for potential permitting requirements.
 - Stabilize the fill stockpiles with hydroseeding, mulch, plastic sheeting, or another BMP from the [Stormwater Management Manual for Western Washington](#) (SWMMWW).
- 13) Revise and resubmit the DMR for the 4th quarter 2024 to reflect the zinc results in the analytical report for 10/4/2024.
- 14) Revise the SWPPP and site map with all the items in this report and in compliance with ISGP Condition S3, and submit to S. Graham.

Burlington Lumber Facility Inspection Report

Permit #: WAR007765

If you have any questions or concerns regarding this inspection report, please contact Sylvia Graham at sylvia.graham@ecy.wa.gov or 360-927-4900.

ADA Accessibility

The Department of Ecology (Ecology) is committed to providing people with disabilities access to information and services by meeting or exceeding the requirements of the Americans with Disabilities Act (ADA), Section 504 and 508 of the Rehabilitation Act, and Washington State Policy #188.

To request an ADA accommodation, contact Ecology by phone at (360) 407-6831 or email at ecyadacoordinator@ecy.wa.gov. For Washington Relay Service or TTY call 711 or (877) 833-6341. Visit [Ecology's website](#) for more information.



Photo 1 [IMG_0993]

Description: 55-gallon drum labeled 'turbine oil' stored without cover or secondary containment near the cooling tower. Photo faces south.



Photo 2 [IMG_0994]

Description: Label for 'turbine oil' on 55-gallon drum shown in Photo 1.



Photo 3 [IMG_0995]

Description: Unlabeled 55-gallon drum and open bucket, both containing unknown liquid, stored without cover and secondary containment near the cooling tower.



Photo 4 [IMG_1004]

Description: Fuel can stored outside without cover or secondary containment near the cogeneration plant.



Photo 5 [IMG_1015]

Description: Multiple 55-gallon drums of Universal Waste, including oil water mixtures, stored without secondary containment in a shed in the southeast side of the facility.



Photo 6 [IMG_1022]

Description: Three 55-gallon plastic drums of truck wash product stored without secondary containment in one of the truck wash racks.



Photo 7 [IMG_1018]

Description: IBC totes on a solid metal platform over secondary containment in the diesel storage area. The platform extends almost to the edge of the containment, so a spill/leak may not drain into the secondary containment sump.



Photo 8 [IMG_1033]

Description: IBC tote with a cut open side, labeled 'saw guide oil,' stored on the ground without cover or secondary containment in the eastern equipment storage yard.



Photo 9 [IMG_1034]

Description: Label for 'saw guide oil' on the IBC tote shown in Photo 8.



Photo 10 [IMG_1035]

Description: Open drum of grease stored inside the open IBC tote shown in Photos 8-9. Water was accumulated at the bottom of the tote.



Photo 11 [IMG_1036]

Description: Tote with open top labeled 'waste oil' and full of brown liquid, stored on the ground without cover or secondary containment in the east laydown yard.



Photo 12 [IMG_1037]

Description: View of brown liquid in the tote shown in Photo 11.



Photo 13 [IMG_1041]

Description: Three totes in the east laydown yard, partially full of dark-colored liquid, stored on the ground without cover or secondary containment. Totes are labelled 'diesel engine oil.' Photo faces west.



Photo 14 [IMG_0996]

Description: Hog fuel and sawdust accumulated on the ground north of the fuel house.



Photo 15 [IMG_1002]

Description: Hog fuel and sawdust accumulated on the ground north of the fuel house. Photo faces west.



Photo 16 [IMG_1005]

Description: Hog fuel and sawdust accumulated on the ground north of the fuel house. Photo faces east.



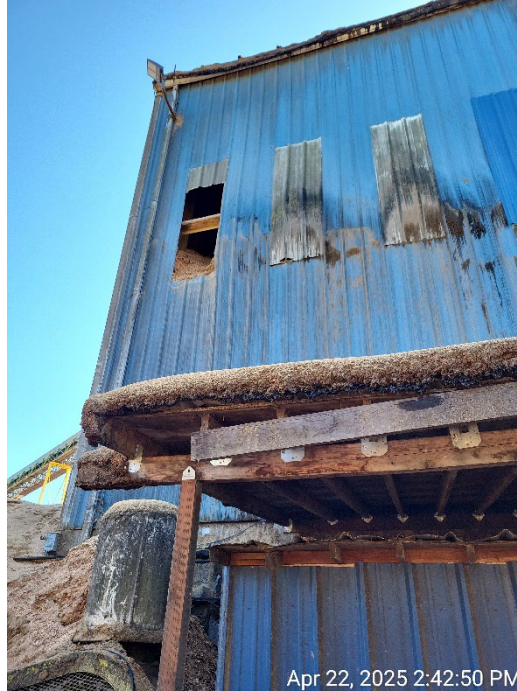
Photo 17 [IMG_1012]

Description: Sediment accumulated around catch basin at the south side of the site.



Photo 18 [IMG_1032]

Description: Wood chips scattered across pavement on McFarland Road at northeast side of site. Photo faces south.



Apr 22, 2025 2:42:50 PM

Photo 19 [IMG_144250]

Description: Missing panel on the north side of the Fuel House through which hog fuel had spilled out of the building, as shown in Photo 20. Photo by Jamie Halpin. Photo faces south.



Photo 20 [IMG_1008]

Description: Accumulated hog fuel below the missing side panel to the Fuel House shown in Photo 19. Photo faces south.



Photo 21 [IMG_144518]

Description: Broken fence panel at fence north of chip pile, east of Fuel House. Chips were spilling through broken section. Photo faces south. Photo by Jamie Halpin.



Photo 22 [IMG_0990]

Description: Dark stain on the ground underneath an air compressor stored in the western equipment storage yard.



Photo 23 [IMG_0991]

Description: A second dark stain on ground in the western equipment storage yard.



Photo 24 [IMG_1017]

Description: Multiple small spills on concrete pad next to the diesel storage area in the southeast of the facility.



Photo 25 [IMG_1006]

Description: Uncovered dumpster for scrap metal located at the north side of the facility.



Photo 26 [IMG_1019]

Description: Uncovered dumpster located at the southeast side of the facility.



Photo 27 [IMG_0992]

Description: Uncovered dumpster located near the cogeneration plant.



Photo 28 [IMG_1021]

Description: Tires stored without cover and multiple dark stains on the ground next to the truck shop.



Photo 29 [IMG_1023]

Description: Catch basin with significant wood waste and sediment accumulated around and on top of the grate, located at the southeast corner of the northeast chip pile.



Photo 30 [IMG_1027]

Description: Exposed soil along the northwest corner of the berm between the ditch and the stormwater pond. Photo faces west.



Photo 31 [IMG_1030]

Description: Exposed soil along the northwest corner of the berm between the ditch and the stormwater pond. Photo faces west.



Photo 32 [IMG_1038]

Description: Building insulation debris scattered on the ground in the eastern equipment storage yard.



Photo 33 [IMG_1040]

Description: Uncovered stockpiles of soil and concrete and asphalt rubble, located east of the eastern rail tracks. Photo faces east.