



NPDES Compliance Inspection Report

DTG Recycle - Yakima

**NPDES Permit Tracking Number
WAG505030**

Inspection Date: 01/29/2021

Prepared by:

Jon Klemesrud
U.S. Environmental Protection Agency, Region 10
Enforcement & Compliance Assurance Division
Water Enforcement & Field Branch
Field, Data & Drinking Water Enforcement Section

Inspector Signature/Date:

JON KLEMESRUD

Digitally signed by JON KLEMESRUD
Date: 2021.04.06 08:23:29 -07'00'

Supervisor Signature/Date:

PETER CONTRERAS

Digitally signed by PETER CONTRERAS
Date: 2021.04.06 10:48:32 -07'00'

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ATTACHMENT A – Site Plan

ATTACHMENT B – Photograph Log

[Unless otherwise noted, all details in this inspection report were obtained from conversations with Brooks Franklin, Wendy Kerry or from observations made during the inspection.]

I. Facility Information

Facility Name:	DTG Recycle - Yakima
Facility Owner:	East Mountain Investments LLC / DTG Enterprises, Inc.
Facility Address:	41 Rocky Top Road Yakima, WA 98908
Mailing Address:	P.O. Box 14203 Mill Creek, WA 98082
Facility Contact(s):	Brooks Franklin, Operations Manager DTG Enterprises, Inc. (509) 965-3621 bfranklin@dtgreecycle.com Wendy Kerr, Office Manager DTG Enterprises, Inc. (509) 956-4980 wkerr@dtgreecycle.com Brian Thompson Sr., Permits & Licensing DTG Enterprises, Inc. (425) 471-4917 brian@dtgreecycle.com
Latitude/Longitude:	N 46.62922668 W -122.6949920
NPDES Tracking Number:	WAG505030
NAICS Code(s):	212319
Facility Size:	59 acres

II. Inspection Information

Inspection Date:	January 29, 2021
Inspector(s):	Jon Klemesrud, Inspector EPA Region 10, ECAD / FDDWES
Other individuals present:	Stephanie Giesin, Sand & Gravel General Permit Manager Water Quality Program Washington State Department of Ecology

Kimberly Grieves, Facilities Specialist Lead
Solid Waste Management Program
Washington State Department of Ecology

Brandon Comfort, Environmental Health Specialist
Yakima Health District

Arrival Time: 10:00 AM

Departure Time: 12:30 PM

Weather: Partly Cloudy

Purpose: To evaluate compliance with the requirements of the Clean Water Act, the National Pollutant Discharge Elimination System (NPDES) and the State Waste Discharge General Permit for Process Water, Stormwater, and Mine Dewatering Discharges Associated with Sand and Gravel Operations (Sand & Gravel General Permit).

III. Permit Information

DTG Recycle - Yakima is permitted under the State of Washington Department of Ecology's Sand and Gravel General NPDES Permit (S&G) for their gravel mining operations. The S&G became effective April 1, 2016, with the expiration date of March 31, 2021.

Permit coverage was transferred to DTG Enterprises, Inc. (DTG) on November 6, 2019 after the facility was sold by prior ownership/permittee Darp Enterprises, Inc. DTG submitted a new Notice of Intent (NOI) for continued permit coverage on August 18, 2020. The permit tracking number is WAG505030. The NOI is for the discharge of permit defined "Type 3 Stormwater" to groundwater.

In addition to their coverage under the S&G Permit, the facility is covered under two Solid Waste Permits with the Yakima Health District (Yakima County) for their limited purpose landfill and petroleum contaminated soil treatment facility.

IV. Facility Background

DTG operates DTG Recycle – Yakima, one of several disposal and recycling facilities owned by DTG in Washington State. In addition to the gravel surface mine, activities on site include a limited purpose landfill and a petroleum contaminated soil treatment facility.

DTG Recycle – Yakima is located in a rural area northwest of the City of Yakima and operates Monday-Friday. The facility has 12 employees. DTG purchased the site (Anderson Rock & Demolition Pits) in the fall of 2019. The land was then subsequently leased from DTG's own subsidiary East Mountain Investments LLC. See **Attachment A**, Site Plan for a facility footprint.

The facility was last inspected for S&G Permit compliance by Washington Department of Ecology (Ecology) on August 25, 2016.

V. Inspection Chronology

This was an announced inspection. One day prior to the inspection, I called and spoke with Brian Thompson Sr, Mr. Thompson is listed as the permit contact on the most recent NOI. During the call I discussed that I had been asked to conduct a routine on-site inspection that would include a facility walkthrough and a review of permit related documents.

Mr. Thompson is located off-site and therefore made arrangements with on-site staff to accompany me on the inspection and we agreed to begin the inspection at 10:00AM the following day. I informed him that I would be joined by representatives of Washington Department Ecology and the Yakima Health District.

Upon arriving on-site at 10:00AM, the inspection team met with Operations Manager Brooks Franklin and exchanged introductions. I presented my inspector credentials and I explained that Ms. Giesen, Ms. Grieves and Mr. Comfort would be shadowing the inspection. I provided Mr. Franklin with a copy of EPA's Small Business Resources Information Sheet.

The inspection consisted of an opening conference, a walk-through of the S&G permitted areas, a review of the Monitoring Plan and other permit related documents. I ended with a closing conference where I discussed my inspection observations.

I was accompanied throughout the inspection by Mr. Franklin. Office Manager Wendy Kerr was present for document review and closing conference.

I was not denied access to any portions of the site and were allowed to inspect all areas requested. See **Attachment B**, for a photograph log of pictures taken during the site walk-through.

VI. Site Review

According to the facility's NOI, the sand and gravel operations on-site are classified under the industrial code 212319 (Other Crushed and Broken Stone Mining and Quarrying). The facility excavates the on-site material and then crushes the rock into approximately 3-5 different products including top course and base course gravel. No process water is generated as the mining is dry excavation and dry crushing.

According to Mr. Franklin, the rock crushing is conducted by DeAtley Crushing Service, a contracted operation that is brought on-site to the mining areas on an as needed basis. The crushed rock products are then stockpiled within the quarry and sold to various customers.

Mr. Franklin stated that gravel surface mining is approximately 40% of DTG Recycle – Yakima’s operation/business, secondary to the limited purpose landfill which is located in a separate area of the property, east of the S&G permitted areas.

The facility was not actively mining or crushing at the time of inspection. Mr. Franklin led us on a tour of the S&G permitted areas including the quarry, lower pit, and stockpile areas. We also viewed groundwater discharge location and the area Mr. Franklin believed to be the nearest potential surface water (abandoned Yakima Tieton irrigation canal). No surface water was observed within the canal at the time of inspection.

To begin the facility tour, we left the main office area and drove separately to the upper mining quarry and associated stockpiles (**Photo 1**), a layer of snow covered the facility from a weather event a few days prior. From the upper quarry we viewed the lower pit (**Photo 2 and Photo 3**). According to Mr. Franklin the groundwater sampling location for S&G permit compliance is within the lower pit, where stormwater occasionally pools and infiltrates. According to Mr. Franklin, the facility has not had a surface water discharge. Best Management Practices (BMPs) for the S&G permitted areas generally include ditching and berming.

The permit requires quarterly pH monitoring for groundwater discharges associated with the industrial activity. The monitoring is conducted by Wendy Kerr, Office Manager for DTG Recycle – Yakima. Ms. Kerr and other select staff continued employment at the facility through the ownership change that occurred in 2019.

After viewing the lower pit, we toured the area to the north and east of the S&G operations including the large vegetative area between facility operations and the abandoned irrigation canal (**Photo 4**), a 3-foot-tall berm borders the canal (**Photo 5 and Photo 6**). We briefly discussed that if the facility ever decided to discharge to a surface water, the permit states that they would need to notify Ecology prior.

There are no paved areas within the S&G areas, stormwater from active areas of the site is either quickly infiltrated or occasionally channels downslope either to the main access road, lower pit, or to vegetated areas where it then infiltrates (**Photo 7 and Photo 8**).

We completed the tour near the northern perimeter of the S&G areas where we observed an area where wood chipping/mulching was occurring. According to Mr. Franklin, a large pile of wooded debris was left by the previous owner and the facility was working through the pile to clean up the area while providing the chipped material as a usable product to customers. Mr. Franklin stated that they were hoping to have the debris pile cleared by April.

Following the facility tour, we made our way back to the office to review permit related records. While at the office, I also viewed the facility's pH meter and calibration standards used when monitoring groundwater discharges, the pH meter was made by Hanna Instruments and was the "Combo" model.

VII. File Review

At the time of inspection, review the following records that were available for review:

- Monitoring Plan – the facility's monitoring plan was reviewed on-site. The plan was developed under the previous ownership name (Anderson Rock and Demolition Pits) and appeared to be applicable to current operations and monitoring procedures that were explained by Ms. Kerr.
- Site Map – the facility's site map used for permit compliance was reviewed on-site (**Photo 9**). The facility had a few iterations of the map available to review, all had been developed under the previous ownership name (Anderson Rock and Demolition Pits). The map reflected the current site operations and features observed during the facility tour.
- Site Log Book – The facility keeps a daily log book of operations and visitors on-site. A cursory review of the log book was made to see what elements might apply to the inspection report requirements outlined in the permit.
- Prior to the inspection, 5 years of Discharge Monitoring Reports (DMRs) were reviewed via Ecology's Water Quality Permitting and Reporting Information System (PARIS). There have been no effluent exceedances since the change of ownership which occurred in November 2019. Prior to the ownership change, there had been one reported pH exceedance in May of 2018.

VIII. Areas of Concern

Observations during the inspection identified the following areas of concern:

A. pH Monitoring Records

Section S4.D.7. of the S&G Permit states that "the permittee must record for each measurement or sample taken, the following information: a. The date, exact place, method, and time of sampling. b. the individual who performed the sampling or measurement. c. The dates the analyses were performed. d. the individual or lab which performed the analyses. e. The analytical techniques or methods used. F. The results of all analyses."

At the time of inspection, when discussing pH monitoring procedures with Ms. Kerr, she stated that for each pH sample only the pH value/measurement is recorded on a small post-it note. The post-it note(s) are stored at her desk until the value is entered into the Discharge Monitoring Report (DMR) and then discarded.

I discussed that the permit requires additional information to be recorded during sampling events, and we then went through the specific section in the permit. I also discussed that per the permit, monitoring records must be kept for a minimum of 3 years from the date of the sample/measurement.

B. Inspection Documentation

Section S4.F.2.c. of the S&G Permit states that “when equipment operates: permittees must conduct daily visual monitoring for oil sheen at all surface water and groundwater discharge points (or representative locations where water collects prior to discharge) when runoff occurs.”

Section S4.G1. of the S&G Permit states that “the permittee must prepare and retain a report on each inspection. The report must include: a. A summary of the inspection. b. The names of personnel that conducted the inspection. c. The date(s) of the inspection. d. Observations relating to the implementation of the Stie Management Plan (SMP). e. Any actions taken as a result of the inspection. f. Any corrective actions or maintenance tasks needed.”

At the time of inspection, Ms. Kerr stated that she conducts a site tour during each rain event, however a report is not generated documenting the required items listed in the permit. When reviewing the facility’s daily log book, the required inspection report items were not included in the log book entries. In general, the log book entries I observed were limited to a visitor sign-in and general operational activity.

C. Missing Components of the Site Management Plan

Section S5.A. of the S&G Permit states the requirement to have a “Site Management Plan (SMP) consisting of “a site map and 4 main sections: 1. Erosion and Sediment Control Plan 2. Monitoring Plan 3. Stormwater Pollution Prevention Plan (SWPPP) 4. Spill Control Plan.”

Section S5.B of the S&G Permit states that the permittee must: “1. Have and fully implement a site specific SMP. 2. Review the SMP at least once a year. Note the date of review and names of personnel that conducted the review in the SMP. 3. Retain and provide the SMP per the requirements in S10.D. 4. The responsible party, as identified in General Condition G1, must sign the SMP and all of it’s modifications.”

Sections S6. of the S&G Permit states that “the permittee must prepare an Erosion and Sediment Control Plan (ESCP) prior to any earth moving activities. The ESCP must identify and describe the erosion and sediment control BMPs that the Permittee will implement at the facility and a schedule for BMP implementation.”

Section S8. of the S&G Permit states that the Site Management Plan (SMP) must include a SWPPP and describes the required elements in detail.

Section S9. of the S&G Permit states the required elements of the Spill Control Plan in detail.

At the time of inspection, when asked to view the facility's Site Management Plan, Ms. Kerr provided me with a folder which included various site maps and a Monitoring Plan. The facility wasn't able to provide a document that contained the required elements of the ESCP, SWPPP and Spill Control Plan. We went over this section in the permit and Mr. Franklin stated that he was going to follow-up with others at DTG to see if the documents had been developed for the facility.

D. Late Submittal of DMRs

Section S10.2 of the S&G Permit states that "permittees must submit DMR's to Ecology on or before the DMR due dates according to the Table 5 below:"

Table 5: Discharge Monitoring Reporting Due Dates

Discharge Monitoring Period	DMR Due Dates:
October, November, December	January 30
January, February, March	April 30
April, May, June	July 30
July, August, September	October 30

While reviewing Discharge Monitoring Report (DMR) data on Ecology's Water Quality Permitting and Reporting Information System (PARIS) prior to the inspection, I observed the 2020 Q1 DMR (January, February, March) and the 2020 Q2 DMR (April, May, June) both to be submitted on August 18, 2020.

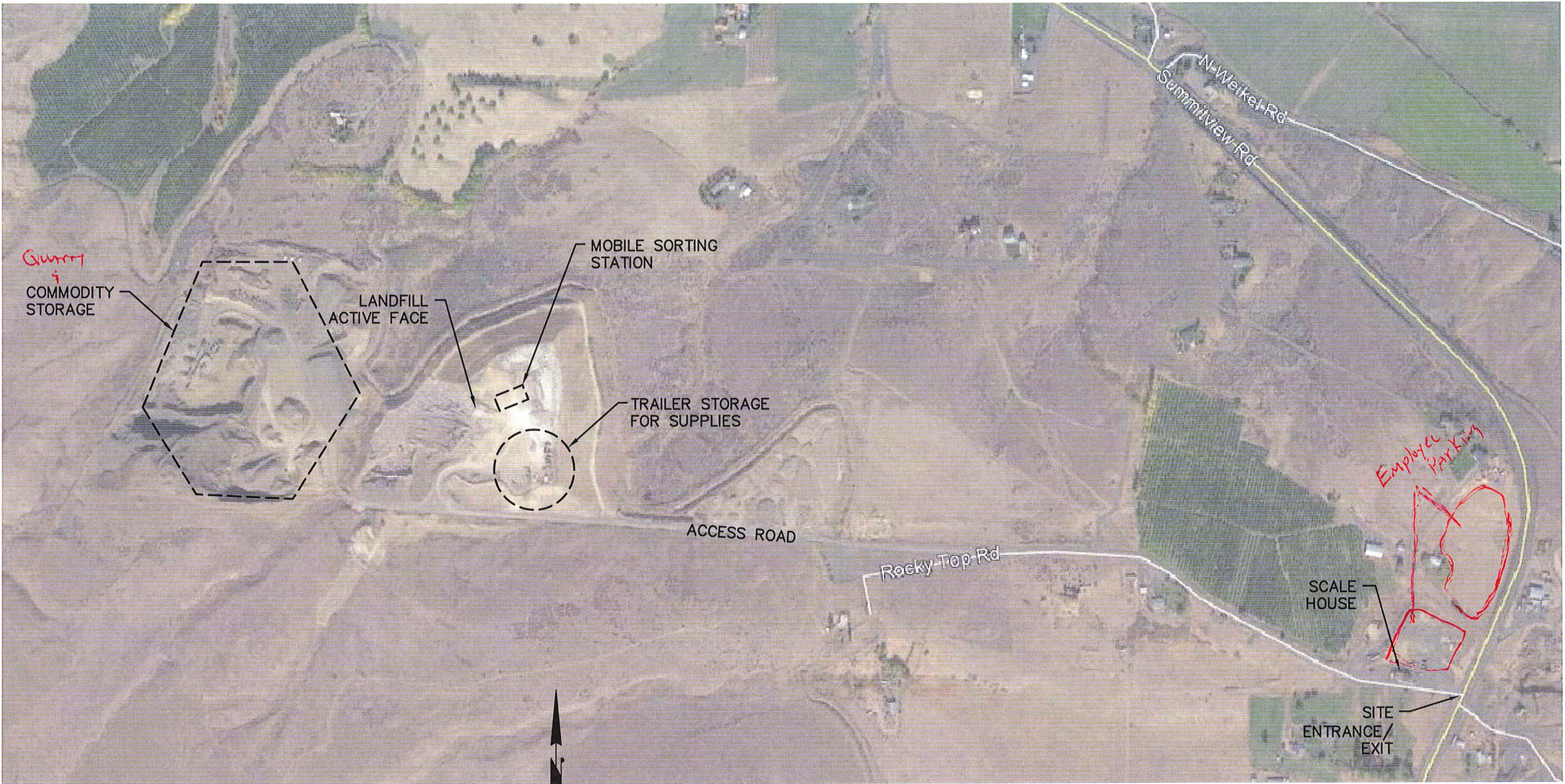
I notified Mr. Franklin and Ms. Kerr of these observations at the time of inspection.

IX. Closing Conference

Following the file review, a closing conference was held with Mr. Franklin and Ms. Kerr where I discussed my observations and areas of concern. I then thanked them both for their time and cooperation with the inspection.

ATTACHMENT A

Site Plan



APPENDIX B: SITE PLAN

PLSA

521 N. 20TH AVE., SUITE 3
YAKIMA, WASHINGTON 98902
(509) 575-6990

DTG ENTERPRISES INC.

**41 ROCKY TOP ROAD,
YAKIMA WASHINGTON 98908**
PARCEL NO. 171310-23003

SHEET NAME: SITE PLAN

DRAWN BY: T.K.L.

DATE: 11/11/2019

JOB NO. 19277

SHEET NO.

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ATTACHMENT B

Photograph Log

All photographs taken by Jon Klemesrud on January 29, 2021

Nikon Coolpix AW100

Photo Log- DTG Enterprises, Inc.



Photo #:01 (DSCN2036)
Description: Facing northeast, photo of an upper mining area and stockpile within the quarry (east of access road).



Photo #:02 (DSCN2037)
Description: Facing northwest, photo of the northern side of lower pit within the quarry.



Photo #:03 (DSCN2038)
Description: Facing southwest, photo of the southern portion of the lower pit within the quarry.



Photo #:04 (DSCN2039)
Description: Facing east, photo of the area and berm between the upper mining area and the abandoned Yakima Tieton irrigation canal.

Photo Log- DTG Enterprises, Inc.



Photo #:05 (DSCN2040)

Description: Facing north, photo of the berm between quarry operations and the abandoned Yakima Tieton irrigation canal.



Photo #:06 (DSC2041)

Description: Facing south while standing on top of the berm between quarry operations and the abandoned Yakima Tieton irrigation canal.



Photo #:07 (DSCN2042)

Description: Facing east, photo near the northeast corner of the upper quarry access road.



Photo #:08 (DSCN2043)

Description: Facing north, photo near the downslope/southern end of the access road. Snowmelt channeling and infiltrating in area between gravel operations and landfill operations.

Photo Log- DTG Enterprises, Inc.



Photo #:09 (DSCN2044)
Description: Photo of the facilities site map.