



NPDES Compliance Inspection Report

Gundies, Inc.

Bellingham, WA

Permit # WAR004242

Inspection Date: February 10, 2021

Prepared by:

Rachel Stephenson

U.S. Environmental Protection Agency, Region 10

Enforcement and Compliance Assurance Division

Water Enforcement and Field Branch

Field, Data, and Drinking Water Enforcement Section

Inspector Signature/Date:

RACHEL STEPHENSON

Digitally signed by RACHEL STEPHENSON
Date: 2021.03.11 12:04:40 -08'00'

Supervisor Signature/Date:

PETER CONTRERAS

Digitally signed by PETER CONTRERAS
Date: 2021.03.11 21:14:37 -08'00'

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- A. Aerial Map
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[Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Kay and Mr. Gunderson; or from observations during the inspection.]

I. Facility Information

Facility Name:	Gundies, Inc.
Facility Owner/Operator:	Gundies, Inc.
Facility Contacts:	Matt Kay Store Manager Gundies, Inc.- Bellingham Location Phone: (360) 733-5036 ext. 231 mkay@gundies.com Pete Gunderson Owner Gundies, Inc. Phone: (360) 733-5036 pgunderson@gundies.com
Facility Location:	3940 E Sunset Drive Bellingham, WA 98226
Lat/Long:	+48.7912776°, -122.4126622°
Mailing Address:	3940 E Sunset Drive Bellingham, WA 98226
NPDES Permit Number:	WAR004242

II. Inspection Information

Inspection Date:	February 10, 2021
Inspector:	Rachel Stephenson, Inspector EPA/R10/ ECAD/WEFB/FDDWES (206) 553-6366
Arrival Time:	10:00 AM
Departure Time:	11:10 AM
Weather Condition:	Overcast; Light Snowfall

Receiving Water: Toad Creek (City of Bellingham MS4)

Purpose: This inspection was conducted to document the facility's compliance with the National Pollutant Discharge Elimination System (NPDES), under the Industrial Stormwater General Permit (Permit # WAR004242).

III. Permit Information

This facility is permitted under the State of Washington's Department of Ecology Industrial Stormwater General Permit (ISGP) number WAR004242. The facility operator certified a renewal Notice of Intent (NOI) to discharge pursuant to the permit on July 02, 2019. The permit became effective on January 1, 2020; the expiration date is December 31, 2024.

This facility was last inspected by the State of Washington Department of Ecology (Ecology) in March of 2017.

IV. Inspection Chronology

This was an announced inspection. The day before the inspection, I spoke with Matt Kay over the phone; we discussed the logistics of the inspection and agreed upon a start time of 10:00 AM.

For this inspection, I operated as the lead inspector. I arrived at Gundies, Inc. (Gundies) at 10:00 AM on February 10, 2021. I met with Mr. Kay in the sales office and we began walking to the outside yard area. At this time, I identified myself as an EPA inspector and presented my credentials to him. We also exchanged business cards. I informed him that the purpose of the visit was to conduct a compliance inspection under the facility's NPDES Permit WAR004242 (henceforth, this will be referred to as the Permit). I was not denied access to the facility.

I conducted the opening conference with Mr. Kay in the yard area behind the sales office. The opening conference involved a discussion of the purpose and expectations of the inspection. Following the opening conference, a facility walk-through took place. At the conclusion of the walk-through, I conducted an in-depth file review in the sales office. After the file review, I concluded the inspection with a closing conference to discuss observations and notes taken throughout the course of the inspection. I was accompanied throughout the inspection by Mr. Kay, with Pete Gunderson answering a few questions for a brief period during the facility walk-through. I left Gundies at 11:10 AM.

V. Background and Activity

Gundies operates as an auto recycling facility in Bellingham, WA. Originally established in 1961, Gundies also owns and operates two other facilities in Washington.

Gundies currently employs 20 individuals at the Bellingham location. Mr. Kay has been serving as the Store Manager for Gundies for over two years. He recently began taking over the stormwater monitoring responsibilities, which were previously handled by the general manager. Mr. Kay conducts stormwater sampling, monthly inspections, and BMP implementation. The general manager, John Vick, currently handles the paperwork side of the facility's stormwater monitoring program. Pete Gunderson is the permittee and owner of Gundies.

According to Mr. Kay, the COVID-19 pandemic has had a significant impact on business and operation over the past year. Specifically, the facility was closed in March and April of 2020; Gundies reopened the Bellingham location on May 1, 2020.

VI. Facility Review

Gundies is located in northeast Bellingham, just south of Toad Creek. See **Attachment A**, Aerial Map. According to the NOI, the facility encompasses 19 acres of land. The majority of the site is unpaved.

Gundies is an automobile wrecking and recycling facility. Typical daily operations involve purchasing used or wrecked automobiles; draining the motors; crushing vehicles; collecting and fixing any salvageable parts for resale; recycling materials; and selling used vehicle parts to insurance companies, auto repair shops, and the public. The facility is comprised of a large outdoor vehicle storage yard, a mobile crusher, and multiple storage sheds each designated for specific auto parts.

This facility contains 2 "outfalls", which is treated as a singular outfall (Outfall A) with two separate monitoring points (Monitoring Points A & B) due to accessibility issues. According to the facility's Stormwater Pollution Prevention Plan (SWPPP), both monitoring points discharge to the City of Bellingham's MS4 system, which ultimately discharges to Toad Creek. During my review of the facility, I noted that all stormwater appeared to be entirely frozen. I did not observe a discharge at the time of the inspection.

Within the unpaved portion of the facility, stormwater is collected and routed via a parallel series of bioretention ditches and pipes (bioswales). From these vegetated bioswales, stormwater travels through oil-water separators and settles in a large bermed holding pond. This pond discharges stormwater through Outfall A, Monitoring Point A. Within the paved portion of the facility, stormwater is collected in catch basins on the northwestern side and routed to Outfall A, Monitoring Point B.

The catch basins on the northeastern side of the paved area collect stormwater and route it to oil water separators, which lead to the holding pond that discharges stormwater to Outfall A, Monitoring Point A. Due to the slope of the property, stormwater generally flows from southwest to northeast. According to Mr. Kay, major upgrades were conducted at the facility during the summer of 2018. These upgrades included the installation of underground piping and the removal of 5 outfalls. Previously, the facility had 7 outfalls. Northern Heights Elementary School was built near the facility about 15 years ago. Mr. Kay mentioned that Gundies sometimes receives stormwater runoff from the school during heavy rain events.

Mandatory stormwater monitoring inspections are conducted on a monthly basis, sometimes more frequently when appropriate. Mr. Kay informed me that he personally conducts these inspections every month. During the monthly inspections, he monitors stormwater discharge and maintains equipment as needed. Mr. Kay also conducts the stormwater sampling. Turbidity, pH, oil & grease (O&G), zinc, and copper samples are taken at Monitoring Points A and B once per quarter, according to Mr. Kay. Edge Analytical of Burlington, WA handles the analysis of all stormwater samples for Gundies. Mr. Vick compiles and submits the Discharge Monitoring Reports (DMRs) to Ecology each quarter.

During my review of the facility, I noted several instances of Best Management Practices (BMP) implementation. The bioswales contained vegetation and rock berms to aid in stormwater filtration and erosion prevention. The bioswales are reseeded annually. Mr. Kay informed me that quarterly sweeping of the paved area is conducted as well. He explained that Nathan Hardebeck of CWT, LLC. aids the facility in stormwater management.

According to the Annual Report for 2019, the facility reported a benchmark exceedance for turbidity in the 4th Quarter. They completed a Tier 1 corrective action in response, which included additional sweeping, additional clearing of the bioretention ditches, and the installation of additional check dams in the ditch lines. According to the Department of Ecology's Permitting and Recording Information System (PARIS), Gundies has also reported two benchmark exceedances for turbidity and copper in the 2nd Quarter of 2020.

See **Attachment A**, which is an aerial map of the facility. See **Attachment B**, which is photographic documentation of the facility as seen during the site review.

VII. Records Review

The following documents were reviewed:

- Stormwater Pollution Prevention Plan (SWPPP) – A copy of the current SWPPP was on-site at the time of the inspection. The most recent revision was dated 11/7/2020. The SWPPP was prepared and revised by Nathan

Hardebeck of CWT, LLC. I conducted an in-depth review of the SWPPP during the inspection. An electronic copy was also provided to me following the inspection.

- Current NPDES Industrial Stormwater General Permit –There was an electronic copy of the current iteration of the permit on-site at the time of the inspection.
- Stormwater Sampling Logs and Analysis Records– There were no sampling records, chain-of-custody forms, and laboratory analysis reports on-site at the time of the inspection. I requested copies of these items via email following the inspection.
- Monthly Inspection Reports – The Inspection Reports were on-site at the time of the inspection. The date of the most recent inspection was 1/13/2021.
- Annual Reports – There was a copy of the 2019 Annual Report on-site at the time of the inspection.

VIII. Areas of Concern

A. Benchmark Exceedances

Section S5.A.2. of the Permit states that, “If a Permittee's discharge exceeds a benchmark listed in Table 2, the Permittee shall take the actions specified in Condition S8.” See Table 2, below:

Table 2: Benchmarks and Sampling Requirements Applicable to All Facilities

Parameter	Units	Benchmark Value	Analytical Method	Laboratory Quantitation Level ^a	Minimum Sampling Frequency ^b
Turbidity	NTU	25	EPA 180.1 Meter	0.5	1/quarter
pH	Standard Units	Between 5.0 and 9.0	Meter/Paper ^c	±0.5	1/quarter
Oil Sheen	Yes/No	No Visible Oil Sheen	N/A	N/A	1/quarter
Copper, Total	µg/L	Western WA: 14 Eastern WA: 32	EPA 200.8	2.0	1/quarter
Zinc, Total	µg/L	117	EPA 200.8	2.5	1/quarter

Section S8.B.1. of the Permit states, “Permittees that exceed any applicable benchmark value(s) in Table 2, Table 3, and/or Table 7 for any quarter during a calendar year shall complete a Level 1 Corrective Action for each parameter exceeded in accordance with the following:

1. Within 14 days of receipt of sampling results that indicate a benchmark exceedance during a given quarter; or, for parameters other than pH or visible oil sheen, the end of the quarter, whichever is later:
 - a. Conduct an inspection to investigate the cause.
 - b. Review the SWPPP and ensure that it fully complies with Permit Condition S3, and contains the applicable BMPs from the appropriate Stormwater Management Manual.
 - c. Make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges.”

During my review of the DMR data prior to the inspection, I noted two reported benchmark exceedances for 2020. There was a copper exceedance with a reported value of 15.2 µg/L (maximum benchmark value is 14 µg/L) in Q2. There was a turbidity exceedance with a reported value of 110 NTU (maximum benchmark value is 25 NTU) in Q2. I mentioned these reported exceedances to Mr. Kay during the inspection. He indicated that these exceedances likely resulted from the lack of on-site monitoring during the period of facility closure in March and April. It is unclear when and if any Level 1 corrective actions were taken.

B. Sampling Requirements Not Met- Mercury, Petroleum Hydrocarbons, and Lead

Section S5.B.1. of the Permit states that, “In addition to the requirements in Table 2, all Permittees identified by an industrial activity in Table 3 shall sample stormwater discharges as specified in Condition S4 and in Table 3.” See Table 3, below:

Table 3: Additional Benchmarks and Sampling Requirements Applicable to Specific Industries

Parameter	Units	Benchmark Value	Analytical Method	Laboratory Quantitation Level ^a	Minimum Sampling Frequency ^b
2. Primary Metals(331xxx), Metals Mining (2122xx), Automobile Salvage and Scrap Recycling (42314x and 42393x), Metals Fabricating (332xxx), Machinery Manufacturing (333xxx)					
Lead, Total	µg/L	64.6	EPA 200.8	0.5	1/quarter
Petroleum Hydrocarbons (Diesel Fraction)	mg/L	10	NWTPH-Dx	0.25	1/quarter

Section S6.C.1. of the Permit states that, “Permittees discharging to a 303(d)-listed waterbody (Category 5), either directly or indirectly through a stormwater drainage system, shall comply with the applicable sampling requirements and numeric effluent limits in Table 6.” See Table 6, below:

Table 6: Sampling and Effluent Limits Applicable to Discharges to 303(d)-listed Waters

Parameter	Units	Maximum Daily ^a		Analytical Method ^b	Laboratory Quantitation Level ^c	Sampling Frequency ^d
		Freshwater	Marine			
Mercury, Total	µg/L	2.1	1.8	EPA1631E	0.0005	1/quarter

Section S4.B.7. of the Permit states that, “The Permittee can reduce monitoring to once a year for a period of three years (12 quarters) based on consistent attainment of benchmark values when...eight consecutive quarterly samples demonstrate a reported value equal to or less than the benchmark value.” **Section S4.B.9.** of the Permit states that, “Suspension of sampling based on consistent attainment does not apply to pollutant parameters subject to...numeric effluent limits based on federal Effluent Limitation Guidelines (Condition S5) or Section 303(d) of the Clean Water Act (Condition S6).”

Prior to the inspection, I conducted a brief review of the facility’s DMR data from the past 3 years. I noted that the facility conducted sampling for lead, petroleum hydrocarbons, and mercury from Q4 of 2018 to Q4 of 2019. However, these parameters were not sampled for throughout 2020. I mentioned this to Mr. Kay during the inspection. He explained that he only recently took over the stormwater sampling responsibilities, so he wasn’t aware of the additional sampling requirements. During the file review portion of the inspection, I looked through the current SWPPP and found sampling instructions relating to mercury, lead, and petroleum hydrocarbons (See Pages 27 & 28 of the SWPPP).

C. Unidentified Discharge Point

Section S4.B.2. of the Permit states that, “The Permittee shall designate sampling location(s) at the point(s) where it discharges stormwater associated with industrial activity off-site.” However, “The Permittee is not required to sample on-site discharges to ground (e.g., infiltration) or sanitary sewer discharges, unless specifically required by Ecology (Condition G12).”

During my review of the facility, I noted a small downspout near Monitoring Point B (See Attachment B, Photo 42). Mr. Kay explained that this downspout was present on the property before Gundies had been established there. The source of this downspout is still unknown, despite multiple dye tests and research into the property’s history. Through the dye tests, they have determined that none of the facility’s catch basins or bioswales contribute to this downspout. Mr. Kay indicated that discharge has been observed at this downspout in the past, but it’s unclear if the source is on Gundies property.

D. Recordkeeping- Sampling Documentation

Section S4.B.4. of the Permit states that, “For each stormwater sample taken, the Permittee shall record the following information and retain it on-site for Ecology review:

- a. Sample date

- b. Sample time
- c. A notation describing if the Permittee collected the sample within the first 12 hours of stormwater discharge events; or, if it is unknown (e.g., discharge was occurring during start of regular business hours).
- d. An explanation of why the permittee could not collect a sample within the first 12 hours of a stormwater discharge event, if it was not possible. Or, if it is unknown, an explanation of why it is unknown if a sample was collected within or outside the first 12 hours of stormwater discharge.
- e. Sample location (using SWPPP identifying number)
- f. Method of sampling, and method of sample preservation, if applicable.
- g. Individual who performed the sampling”

During the file review portion of the inspection, I performed a thorough review of the facility’s SWPPP and associated stormwater monitoring documents. I did not observe any sampling records on-site at the time of the inspection. I mentioned this to Mr. Kay during the closing conference. He explained that Mr. Vick handles the paperwork side of the stormwater monitoring program, with assistance from Mr. Hardebeck, so he offered to ask for copies of these records following the inspection.

On 3/4/2021, I reached out to Mr. Kay via email to check up on the retrieval of the sampling records. Mr. Hardebeck reached out to me on 3/5/2021 and provided an electronic copy of the SWPPP. Mr. Vick also reached out to me on 3/5/2021 to ask if I needed anything else. I responded to both emails, explaining that I still needed copies of the sampling records. I have not received copies of the sampling records as of 3/11/2021.

E. Recordkeeping- Laboratory Documentation

Section S4.B.5. of the Permit states that, “The Permittee shall retain laboratory reports on-site for Ecology review and shall ensure that all laboratory reports providing data for all parameters include the following information:

- a. Date of analysis
- b. Parameter name
- c. CAS number, if applicable
- d. Analytical method(s)
- e. Individual who performed the analysis
- f. Method detection limit (MDL)
- g. Laboratory quantitation level (QL) achieved by the laboratory
- h. Reporting units

- i. Sample result
- j. Quality assurance/quality control data

During the file review portion of the inspection, I performed a thorough review of the facility's SWPPP and associated stormwater monitoring documents. I did not observe any laboratory documentation on-site at the time of the inspection, other than a blank chain of custody template form. I mentioned this to Mr. Kay during the closing conference. He explained that Mr. Vick handles the paperwork side of the stormwater monitoring program, with assistance from Mr. Hardebeck, so he offered to ask for copies of these records following the inspection.

On 3/4/2021, I reached out to Mr. Kay via email to check up on the retrieval of the laboratory documentation. Mr. Hardebeck reached out to me on 3/5/2021 and provided an electronic copy of the SWPPP. Mr. Vick also reached out to me on 3/5/2021 to ask if I needed anything else. I responded to both emails, explaining that I still needed copies of the lab analysis records and chain of custody forms. I have not received copies of the laboratory documentation as of 3/11/2021.

IX. Closing Conference

A closing conference was held with Mr. Kay to discuss my inspection observations. I thanked him for his time and cooperation with the inspection. I left the facility at 11:10 AM.

ATTACHMENT A

Aerial Map



ATTACHMENT B

Photograph Log

All photographs taken by Rachel Stephenson on February 10,
2021 Nikon Coolpix AW120, Serial # 32057443

Photo Log – Gundies, Inc.

Photo #:01 (DSCN0601)

Description: Facing southeast, photo of the northeast section of the paved area.



Photo #:02 (DSCN0602)

Description: Facing southeast, photo of parts storage within the paved portion of the facility.



Photo #:03 (DSCN0603)

Description: Facing northeast, photo of one of the bioswales.



Photo #:04 (DSCN0604)

Description: Facing east, photo of the mobile crusher. Vehicle motors are drained prior to crushing.

Photo Log – Gundies, Inc.

Photo #:05 (DSCN0605)

Description: Facing northeast, photo of the mobile crusher.



Photo #:06 (DSCN0606)

Description: Facing southeast, photo of stored vehicles and parts in the unpaved yard area.



Photo #:07 (DSCN0607)

Description: Photo of one of the vegetated bioswales. The water was completely frozen at the time of the inspection.



Photo #:08 (DSCN0608)

Description: Facing northeast, photo of one of the vegetated bioswales. Note the rock berm in the middle.

Photo Log – Tripak Yard #1

Photo #:09 (DSCN0609)

Description: Photo of one of the culverts that connects the bioswales.



Photo #:10 (DSCN0610)

Description: Photo of one of the culverts that connects the bioswales.



Photo #:11 (DSCN0611)

Description: Facing northeast, photo of one of the bioswales that routes stormwater to an oil/water separator. Note the rock berm in the middle.



Photo #:12 (DSCN0612)

Description: Photo of one of the bioswales that routes stormwater to an oil/water separator.

Photo Log – Gundies, Inc.

Photo #:13 (DSCN0613)

Description: Facing north, photo of one of the bioswales that routes water to an oil/water separator.



Photo #:14 (DSCN0614)

Description: One of the catch basins that routes stormwater to Monitoring Point B.



Photo #:15 (DSCN0615)

Description: Photo of one of the bioswales.



Photo #:16 (DSCN0616)

Description: Facing south, photo of the yard with Northern Heights Elementary School in the background.

Photo Log – Gundies, Inc.

Photo #:17 (DSCN0617)

Description: Facing northeast, photo of one of the bioswales.



Photo #:18 (DSCN0618)

Description: Facing southwest, photo of one of the bioswales along the access road in the unpaved yard.



Photo #:19 (DSCN0619)

Description: Facing northeast, photo of one of the bioswales with erosion prevention materials at the entrance and exit.



Photo #:20 (DSCN0620)

Description: Facing south, photo of one of the bioswales with erosion prevention materials at the entrance and exit.

Photo Log – Gundies, Inc.

Photo #:21 (DSCN0621)

Description: Facing south, photo of a small fluid leak. Note the implementation of an absorbent pad.



Photo #:22 (DSCN0622)

Description: Facing northeast, photo of on the of the bioswales with erosion prevention materials at the entrance and exit. Note the rock berm in the middle.



Photo #:23 (DSCN0623)

Description: Facing south, photo of one of the bioswales.



Photo #:24 (DSCN0624)

Description: Photo of stored materials in the unpaved yard.

Photo Log – Gundies, Inc.

Photo #:25 (DSCN0625)

Description: Facing southwest, photo of one of the bioswales with erosion prevention materials and the entrance and exit.



Photo #:26 (DSCN0626)

Description: Facing northeast, photo of one of the bioswales with erosion prevention materials and the entrance and exit.



Photo #:27 (DSCN0627)

Description: Photo of one of the catch basins that route stormwater to Monitoring Point B.



Photo #:28 (DSCN0628)

Description: Facing north, photo of parts storage near one of the storage sheds within the paved portion of the facility. Note the asphalt berm.

Photo Log – Gundies, Inc.

Photo #:29 (DSCN0629)

Description: Facing northeast, photo of stormwater flow patterns within the paved area of the facility.



Photo #:30 (DSCN0630)

Description: Facing northeast, photo of one of the catch basins that route stormwater to an oil/water separator (ultimately to Monitoring Point A). Note the absorbent boom and filter sock.



Photo #:31 (DSCN0631)

Description: Facing northeast, photo of a culvert that connects the large vegetated holding pond to a smaller pond. This smaller pond receives the stormwater that has been routed through the oil/water separators.



Photo #:32 (DSCN0632)

Description: Facing northeast, photo of a culvert that connects the large vegetated holding pond to a smaller pond. This smaller pond receives the stormwater that has been routed through the oil/water separators.

Photo Log – Gundies, Inc.

Photo #:33 (DSCN0633)

Description: Facing northeast, photo of the bermed barrier wall surrounding the holding pond that discharges to Outfall A.



Photo #:34 (DSCN0634)

Description: Photo of a tote containing Diesel Exhaust Fluid (DEF). Mr. Kay informed me that this is the last tote remaining on-site. The facility plans to stop using DEF.



Photo #:35 (DSCN0635)

Description: Photo of one of the catch basins that route stormwater to Monitoring Point B.



Photo #:36 (DSCN0636)

Description: Facing north, photo of Monitoring Point B. This drainage ditch connects to Outfall A.

Photo Log – Gundies, Inc.

Photo #:37 (DSCN0637)

Description: Facing southwest, photo of the drainage ditch that connects to Monitoring Point B via a culvert.



Photo #:38 (DSCN0638)

Description: Facing northeast, photo of Monitoring Point A. Note that the vegetated holding pond is frozen solid.



Photo #:39 (DSCN0639)

Description: Facing southwest, photo of Monitoring Point A.



Photo #:40 (DSCN0640)

Description: Facing southwest, photo of the large holding pond.

Photo Log – Gundies, Inc.



Photo #:41 (DSCN0641)

Description: Facing east, photo of the large holding pond.



Photo #:42 (DSCN0642)

Description: Facing southeast, photo of the unidentified discharge point.



Photo #:43 (DSCN0643)

Description: Photo of the area around the unidentified discharge point.

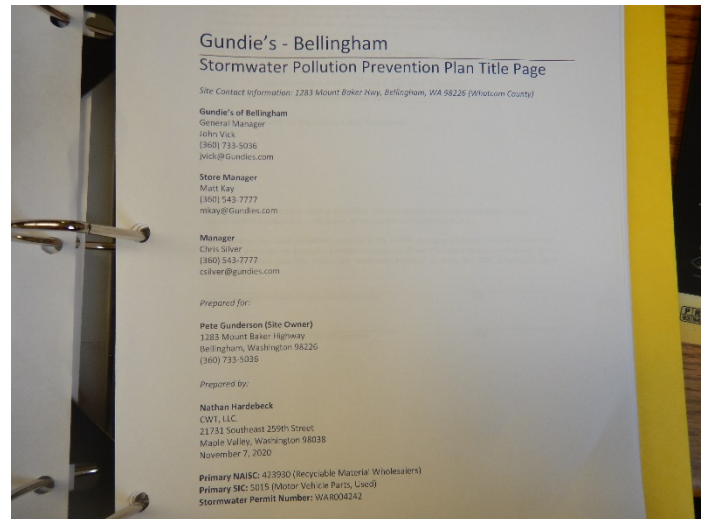


Photo #:44 (DSCN0644)

Description: Photo of current SWPPP title page.