 DEPARTMENT OF <b>ECOLOGY</b> State of Washington	<h2 style="text-align: center;">STORMWATER COMPLIANCE INSPECTION REPORT</h2>		
<h3 style="text-align: center;">State of Washington Department of Ecology</h3>			
<b>Section A: General Data</b>			
Inspection Date(s): 2/25/2019	Ecology Inspector(s): Stephanie Barney, Elizabeth Fint, Jess Eaken	Inspection Type: Unannounced Inspection	
Permittee Name: Jim Rard Permittee Mailing Address: 2417 T Ave		NPDES Permit #: WAG030095	
		Permit Type: Boatyard Other:	
City: Anacortes	State: WA	Zip: 98221	County: Skagit
Discharges to: <i>(Please check all that apply)</i> <input checked="" type="checkbox"/> Surface Water <input type="checkbox"/> Ground Water		Receiving waters: Maine Waters	
Weather at time of inspection: Cold and dry			
<b>Section B: Facility Data</b>			
Water Quality Name and Location of Site Inspected:  Martine Servicer Inc 2417 T Ave Anacortes, WA 98221		GPS      Lat: Long:	Entry Time 10:15  Exit Time 11:30
On-Site Representative Name: Curtis Hamburg  Title: Paint/Fiberglass Lead  Phone: 360-239-8200 Email: curtis@marinesc.com			Additional Participants:  N/A
<b>Section C: Summary of Findings/Comments</b>			
<b><u>BACKGROUND</u></b>			
<p>The Coverage Page issued August 8, 2016 under Boatyard General Permit (BYGP) No. WAG030095 for Marine Servicer Inc at 2417 T Ave, Anacortes, Skagit County authorizes process water discharges from pressure washing to the City of Anacortes Publically Operated Treatment Works (POTW) at outfall PM02 and stormwater discharges from boatyard activities (SIC 3732 – Boat Building and Repairing) to marine waters at outfall S001.</p>			
<p>The facility covers an area of one acre, approximately seventy percent of which is impervious surface and twenty percent is buildings. The yard has capacity of up to twenty vessels at any given time. The facility hauls out of the water and pressure washes approximately eight hundred vessels per year. Boatyard activities occur year-round with an increase in activity in spring, summer, and fall.</p>			
<p>Ecology's last documented inspection of the facility was on November 30, 2010.</p>			
<p>Under the previous BYGP permit cycle, June 1, 2011 - May 31, 2016, the facility triggered a Level Three Response for greater than six stormwater benchmark exceedances for copper and zinc. On August 8, 2014, Landau Associates prepared an Engineering Report to design and install a stormwater treatment system, meeting the Level Three Response requirements. Steve Hood, Water Quality Engineer for the Department of Ecology Bellingham Field Office on August 14, 2014, approved the Engineering Report. The Engineering Report identified the StormwaterRx Aquip filtration unit, specifically the option of three pre-engineered plastic housings that can be arranged end-to-end along the northeastern portion of the facility, as the preferred stormwater treatment alternative. The report's schedule for installation of the preferred option was within 12-months of Ecology's approval. Implementation should have occurred on or before August 14, 2015.</p>			
<p>The purpose for this inspection was to follow up to ERTS No. 685019, received by Ecology on October 31, 2018. The complaint alleges the facility was grinding fiberglass on the morning of October 29<sup>th</sup> and not containing the debris. Debris settled on several cars parked in the neighboring Anacortes Marina parking lot. The complaint says this is not an isolated occurrence.</p>			

**INSPECTION/OBSERVATIONS**

Yellow lines painted on both sides of the concrete portion of the boat ramp depict where pressure washing must occur in order to capture waste wash water in the trench drain at the lowest point on the wash pad. See Figures 1 and 2. There is no physical barrier to contain overspray from pressure washing activities. The trench drains to a six-foot-deep by three-foot-wide sump located roughly twenty-feet to the north of the pressure wash pad, and roughly five-feet west of the marine shoreline. See Figure 3.

The outlet pipe from the sump connects to a sanitary sewer manhole roughly another twenty-feet north. There is no structural mechanism to prevent discharge to the sanitary sewer once water reaches the height of the sump's outlet pipe. See Figure 4. Travel lift operators manually pump untreated pressure wash water from the sump into a modified five hundred-gallon propane tank, located between the sump and the shoreline. See Figure 5. The operators add a flocculent to the tank, and then agitate the water with a bubbler to mix. Curtis Hamburg says it takes about one week to fill the tank, assuming the average length of boat pressure washed is about forty-feet. There is no mark on the tank to tell operators when it is full. Operators must physically climb up the tank and look inside to gauge capacity. Treated water empties from the bottom of the tank to the same sump and discharges to the City of Anacortes POTW when the water fills to the height of the outlet pipe.

Ecology did not witness pressure washing at the time of the inspection. Curtis Hamburg said the facility uses square shaped buckets (i.e. cat litter container) to scoop solids out of the trench drain in the pressure wash pad. The facility empties the buckets filled with solids from the trench drain into two plastic trashcans, lined with geotextile and perforated to drain liquid from solids. See Figure 6. The trashcans are located on both sides of the trench. The liquid drains to the trench. Two metal drums located next to the treatment tank contain solids from the trashcans. See Figure 7.

The method for filtering solids/flocculent from treated water when emptying the tank was not readily apparent upon inspection of the treatment system, nor did Curtis Hamburg describe a filtration step prior to discharge. Curtis told Ecology the facility collects samples of treated pressure wash water from the base of the tank. See Figure 8. He explained if operators fail to run the sump pump, untreated pressure wash water bypasses the treatment system and discharges directly to the sanitary sewer when the sump fills to the height of the outlet pipe. The facility relies on employee training to ensure proper management of pressure wash discharges.

Stormwater is free to enter the collection sump and discharge to the POTW when the sump fills to the height of the outlet pipe.

Curbing at the edge of the pavement between the facility and marine waters is present for a portion of the eastern boundary. There is no curbing between the treatment system and marine waters. A break in the curbing (damaged/missing curb) was located within fifty-feet of the treatment system. Curtis said the facility has repaired the curb break in the past. The curbing is currently missing and a rill from the top of the slope to marine waters is present. See Figure 9.

Roughly, sixty-five-feet from the marine shoreline, in a workspace adjacent to the neighboring property, a vessel sat on stands with a tarp laid out on the ground beneath. No one was actively sanding the hull during Ecology's visit. The tarp was a few feet shorter than the vessel. No physical barrier exists to contain airborne dust generated from sanding. Only a chain link fence separates the facility from the neighboring property. Where the tarp did not reach, Ecology observed red dust deposition on the ground beneath the vessel from sanding the hull. We did observe a power sander attached to a shop vacuum stationed beneath the vessel. See Figures 10, 11, and 12.

Curtis Hamburg said the facility removes dust deposited on the ground with a dedicated shop vacuum with a floor attachment secured to the hose. Later we came across the shop vacuum located within an indoor workspace. See Figure 13.

Paint residue, soil, and oil residue stains the pavement of vacant workspaces in the yard. The tarp beneath a freshly painted hull is not securely fastened and several feet shorter than the vessel. See Figure 14. Ecology staff noted a paint can without containment beneath this vessel upon arrival at the facility. Someone removed the paint can while Ecology was in the office meeting Curtis Hamburg upon arrival.

Ecology observed free liquid from a very recent oil spill on pavement just beyond the pressure wash pad. See Figure 15. Curtis Hamburg believes the spill occurred of Friday of last week. He says the boom truck has a leak. The presence of free liquid suggests the spill occurred very recently. Ecology did not see the boom truck. Curtis says the facility parks the boom truck at another property in Anacortes. He did not mention any facility procedures to clean up spills when discovered.

The paint mixer is located on the south wall of the building. A housing structure with three walls and a roof eliminate direct exposure of the mixer to stormwater. The housing sits within secondary containment. Presumably, the containment

is for the collection of paint spills; however, it collects stormwater. A hose connected to a five-gallon bucket drains the secondary containment. The bucket sits beneath the mixer in a gravel-filled trench that runs along the south wall of the building. Curtis Hamburg tipped the bucket with his foot and said it is full, presumably of commingled stormwater and paint. See Figures 16 and 17.

Paint residue from past spills is present on the pavement surrounding the mixer. It appears a spill of white paint occurred more recently. White paint residue is present on the top, and sides of the trench retaining wall. Dried white paint is on the geotextile fabric placed beneath a small catch basin grate at the southwest corner of the building. This catch basin is located within ten-feet of the paint mixer. There is no paint residue or dried paint chips on the catch basin grate. See Figures 18 and 19.

An Engineering Report dated August 8, 2014 describes a potential French drain near the trench. Ecology obtained this information after the inspection. The connection of this trench to a potential French drain remains unknown.

Four barrels, three metal and one plastic, sit on a wood pallet directly across from the paint mixer. The bungs are closed, but the barrels contain unknown liquids. Paint residue, and a wooden stirring stick is present on the tops of the drums, and on the pavement beneath the pallet. See Figure 20.

Curtis Hamburg found a discarded aerosol spray can attached to a coating product on the fence line on the west side of the property. Curtis believes this product is the source of residue located on pavement near the pressure wash water treatment tank. See Figure 21.

A modified shipping container provides storage for paint. The container is located on the west wall of the building. See Figure 22. Next to the shipping container, within a fenced perimeter is a large double-walled fuel tank. Also located within the fencing is a mobile fueling tank. The facility has wrapped absorbent cloths around the nozzle of the mobile fueling unit. Oil residue stains the pavement beneath where the mobile fueling unit sits. There is no spill kit within the vicinity of the large fuel tank or mobile fueling unit. White residue, presumably paint, coats the wheels of the mobile fueling unit. See Figures 23 and 24.

Ecology noted white residue, presumably paint, on the pavement just outside the fuel tank perimeter fencing. See Figure 25.

Boat building and repair activities occur within indoor workspaces, adjacent to the offices within the facility's single building. The building has concrete floors and no drains. Exhaust ports exist on the west wall of the building. Particulate fall out from the exhausts has deposited on the ground between the paint storage-shipping container and building. This area drains to the small catch basin at the southwest corner of the building. See Figure 26.

Curtis Hamburg explains stormwater collected in facility catch basins drains to a central catch basin roughly forty-five-feet from the pressure wash pad. Geotextile fabric is beneath the catch basin grate. Curtis says this catch basin drains north to a catch basin located on Anacortes Marina's property. The facility collects their stormwater samples from the PVC sampling port within the catch basin sump. Information collected after the inspection contradicts Curtis's explanation of on-site drainage.

Curtis Hamburg told Ecology that no one is documenting visual inspections of the facility. He is aware of a visual inspection checklist with the SWPPP. Curtis provided to Ecology a copy of the checklist.

#### Section D: Compliance/Recommendations

*Note: See Corrections Required Form: Yes*

#### **Ecology found Marine Servicer in violation of the following permit requirements:**

**Failure to meet Condition S2.A.2 Boatyards Discharging Pressure-Wash Wastewater to a Non-Delegated POTW, General Prohibitions** (Pg. 11): The permittee must not introduce to the POTW any pollutant(s), which cause pass through, upset, or interference. Submit to Ecology copies of lab analysis from the June 2016 samples and all lab analysis sheets for June, July, August, and September 2018.

**Failure to meet Condition S2.B. Boatyards Discharging Stormwater Runoff from Areas with Industrial Activity to a Non-Delegated POTW** (Pg. 12): The permittee may discharge stormwater runoff to a non-delegated POTW only upon special approval from Ecology. Upon further review of Ecology records, no record exists granting approval for discharges of stormwater to the POTW. Submit to Ecology documentation of approval; or, submit a request to Ecology demonstrating 1) No other option is feasible; 2) That the POTW has excess wet season hydraulic capacity; 3) That the POTW is willing to accept the discharge; and, 4) How the facility will reduce the amount of stormwater runoff sent to the POTW by separating uncontaminated water and discharging it directly.

**Failure to meet Condition S3.D. Upland Vessel Maintenance and Repair** (Pg. 17): When stripping, sanding, scraping, sandblasting, painting, coating, and/or varnishing any portion of a vessel, Permittees must collect and manage all particles, oils, grits, dusts, flakes, chips, drips, sediments, debris, and other solids to prevent their release into the environmental and entry into waters of the State.

Permittees must secure drop cloths, tarpaulins, structures, drapes, shrouding or other protective devices around the vessel, as necessary, to collect all such materials. The Permittee must routinely clean up all collected materials to prevent their release into the environmental and entry into waters of the state.

**Failure to meet Condition S3.E. Solids Management** (Pg. 17): The Permittee must control and collect all particles, oils, grit, dusts, flakes, chips, drips, sediments, debris, and other solids from work, service, and storage areas of the boatyard to prevent their release into the environment and entry into waters of the State. When solids-generating activity is occurring, the minimum collection frequency is once per day and prior to tidal inundation. The Permittee must avoid wetting the solids during collection and must not wash solids into any surface waters or into a stormwater collection system.

**Failure to meet Condition S6.A. Pressure Wash Effluent to Sanitary Sewer** (Pg. 21): The Permittee is required to monitor discharges of pressure wash effluent to the sanitary sewer. Aside from one entry of No Discharge in June, no samples were taken of discharges to the POTW in 2017.

**Failure to meet Condition S6.C. Analytical Procedures** (Pg. 21): The Permittee must ensure laboratory results comply with the detection limit and quantitation level specified in this requirement. This includes verification the laboratory tests samples for all required parameters. The June 2018 DMR, for discharges from Monitoring Point PM02, is missing lab analysis for lead.

**Failure to meet Condition S6.D. Visual Inspection Requirements** Pg. 23): The Permittee must conduct and document a visual inspection of the site once per week when boatyard activities are occurring at the site. Qualified personnel must conduct the inspection. Please refer to S6.D, beginning on page 23 of the BYGP for a complete list of inspection requirements.

The Permittee shall record the results of each inspection in an inspection report or checklist and keep the records on-site for Ecology's review.

**Failure to meet Condition S7.A.1. Level One Response** (Pg. 24): The facility triggered a Level One response for exceedances of the copper, zinc, and lead benchmark in September 2016 at Monitoring Point PM02, discharges to the City of Anacortes POTW. Ecology never received the Level One Response Form.

The facility triggered a Level One Response for exceedances of copper and zinc benchmarks in October 2016 at Monitoring Point S001, discharges to marine waters. Level One Response was again triggered in November 2016, January 2017 for copper and zinc, and copper again in October 2017. Ecology never received any Level One Response Forms.

**Failure to meet Condition S7.A.2. Level Two Response** (Pg. 25): The facility triggered a Level Two Response for exceedance of the zinc benchmark in October 2017 at Monitoring Point S001, discharges to marine waters. The facility triggered a Level Two Response for exceedance of the copper benchmark in November 2017 at Monitoring Point S001, discharges to marine waters. Ecology never received any Level Two Source Control Reports.

**Failure to meet Condition S7.A.3. Level Three Response** (Pg. 26): The facility triggered a Level Three Response for exceedance of the zinc benchmark in January 2018 at Monitoring Point S001, discharges to marine waters. The facility triggered a Level Three Response for exceedance of the copper benchmark in January 2018 at Monitoring Point S001, discharges to marine waters. Ecology never received the Engineering Report outlining preferred stormwater treatment.

Ecology became aware of an Engineering Report, submitted August 8, 2014 and approved August 14, 2014, after the inspection. The report was prepared and submitted for Level Three Response triggered under the previous permit cycle. It proposed installing the StormwaterRx Aquip filtration unit, specifically the option of three pre-engineered plastic housings that can be arranged end-to-end, along the northeastern portion of the facility. Implementation should have occurred on or before August 14, 2015. Ecology saw no stormwater treatment, nor did Curtis Hamburg explain stormwater treatment, during the inspection.

Ecology spoke with Curtis Hamburg in a follow up phone call on March 13, 2019. The purpose for this conversation was to verify there is no stormwater treatment system currently installed at the facility. Curtis spoke of an exemption from the City of Anacortes that prompted Ecology to contact staff at the City's POTW. City staff responded to Ecology's request for mapping of utilities at the facility with digital copies of documents relating to a cleanup action at the facility in 2005-2006. Utility maps within the documents, and City mapping shows a different direction of drainage for stormwater than what

Curtis explained during the inspection, and what's present in the August 8, 2014 Engineering Report. The 2005-2006 mapping shows stormwater generated on-site collects in a central basin, within fifty-feet of the pressure wash pad, then heads northwest to the City of Anacortes' municipal separate storm sewer system (MS4). Curtis identified the same on-site catch basin as the collection point for the facility's stormwater; however, his understanding is it drains to the northeast, to a catch basin in the parking lot of neighboring Anacortes Marina.

Although conflicting in direction of flow, both sets of maps demonstrate stormwater from the site discharges to the City's MS4 and not the POTW.

**Failure to meet Condition S8.A.1 Public Access and Signature (Pg. 29):** The SWPPP is not signed.

Condition S8 Stormwater Pollution Prevention Plan (SWPPP) (Pg. 28): Curtis Hamburg printed a copy of the facility's SWPPP for Ecology reference. Markings on the SWPPP made August 8, 2016 incorporates some, but not all, changes to the BYGP effective upon reissuance.

It includes mandatory Best Management Practices (BMPs) as required by Condition S3 of the BYGP, with the exception of Tidal grids, not present at the facility. The mandatory BMP descriptions in the SWPPP are almost verbatim the permit language. Worksheets 1-3, 9-10 provide facility-specific information.

**Failure to meet Condition S8.B.3.f. Spill Prevention and Emergency Cleanup Plan (Pg. 34):** Section 4.2.5 of the facility's SWPPP requires stopping, containing, and cleaning up all spills immediately upon discovery. It calls for the placement of emergency spill containment and cleanup kit(s) at outside areas where there is a potential for fluid spills. The kits must contain appropriate materials, readily accessible, and contents maintained.

**Failure to meet Condition S9.A. Reporting (Pg. 36):** The Permittee must submit DMRs no later than the 28<sup>th</sup> day of the month following the monitoring period. Upon review of DMR records, the facility has a history of submitting DMRs late.

**Recommendations:**

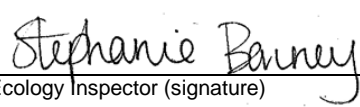
Ecology recommends the facility implement the following recommendations:

Condition S3.A. Vacuum Sander Required: Based on dust deposition on the ground, evaluate if employees operate the vacuum sander properly and/or if it requires maintenance. Maintain the sander as appropriate.

Condition S8.B.3.c. Pollution Prevention Team: Curtis Hamburg told Ecology staff Skip Dassler has retired. Update the Pollution Prevention Team worksheet.

Condition S8.B.3.g. Employee Training: The SWPPP states all boatyard activities (i.e. boat maintenance or repair work) within the facility's yard is conducted by trained facility employees. The copy provided includes a schedule for employee training. According to the schedule, all employees receive training annually. Ecology is not aware of any training records that demonstrate training has occurred as prescribed. It is vital training is conducted, and documented, as the facility relies solely on properly trained employees to insure proper operation of the pressure wash treatment system and wash pad decontamination.

*Noncompliance with the limits, monitoring requirements, terms and/or conditions established in your permit may result in formal enforcement action by the Department.*

	3/29/2019	Samples Taken? No
Ecology Inspector (signature) Water Quality Program Bellingham Field Office 913 Squaticum Way, Unit 101 Bellingham, WA 98225 BFO Tel: 360-255-4400	Date	Photos Taken? Yes
		DMR Submittal Violations <input checked="" type="checkbox"/>

**Photo Addendum**Water Quality Name: Marine  
Servicenter Inc

NPDES Permit #: WAG030095

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Figure 1 Description: Pressure wash pad located on concrete just beyond boat ramp.



Figure 2 Description: Yellow lines depict limits of pressure wash pad. Grade from yellow lines slopes in toward the center.

All photos obtained during this inspection are available upon request and are representative of site conditions.



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Figure 3 Description: Sump associated with pressure wash pad and treatment system.



Figure 4 Description: Sump outlet to City of Anacortes POTW.

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Figure 5 Description: Modified 500-gallon propane tank to treat pressure wash water prior to discharge to City of Anacortes POTW. The tank is within 5-feet of the marine shoreline. No curbing present on boundary between tank and marine waters.



Figure 6 Description: Trash can lined with geotextile.



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Figure 7 Description: Solids removed from pressure wash pad trench drain. Trashcans show in Figure 1.



Figure 8 Description: Sampling point for pressure wash discharges to the City of Anacortes POTW.

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Figure 9 Description: Broken, missing curbing and associated rill on slope to marine waters.



Figure 10 Description: Red dust deposition on ground beneath vessel because the tarp is too short.

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Figure 11 Description: Tarp beneath vessel unsecured and too short to provide adequate cover to collect dust generated from bottom sanding.



Figure 12 Description: Power sander attached to shop vacuum.



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Figure 13 Description: Shop vacuum with floor attachment, used for vacuuming dust deposition on pavement.



Figure 14 Description: Paint and oil residue, and sediment on pavement of workspaces in the yard.

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Figure 15 Description: Free liquid present at an oil spill in the yard near the pressure wash pad. A leaking boom truck is likely the source of the spill. Boom truck not present at the facility at the time of the inspection.



Figure 16 Description: Paint mixer, housing, and secondary containment.



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Figure 17 Description: Bucket connected by hose to mixer housing secondary containment. The bucket is full, presumably with commingled stormwater and paint. The trench, which the mixer sits in, is lined with gravel.



Figure 18 Description: White paint residue from past spill on top and side of trench wall.

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Figure 19 Description: White paint staining on geotextile fabric, but not on catch basin grate, in the southwest corner of the facility. This catch basin is located within 10-feet of the paint mixer.



Figure 20 Description: Barrels sitting directly across from the paint mixer, containing unknown liquids, with presence of paint residue on the tops and pavement surrounding the barrels.

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Figure 21 Description: Coating applicator, found discarded along the western fence line.



Figure 22 Description: Shipping container on west side of building where paint is stored.



## Photo Addendum

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Figure 23 Description: Large, double-walled fuel tank.



Figure 24 Description: Mobile fueling unit. Absorbent cloth wrapped around the nozzle. Oil residue stains the pavement where the fueling unit sits. Paint residue on the tires.

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Figure 25 Description: White residue, presumably paint, on pavement just outside the gate to the fuel tank perimeter fence, near the northwest corner of the facility.



Figure 26 Description: Particulate fall out from inside exhausts depositing on the pavement between the building and paint storage-shipping container. The absence of dust suggests two barrels were previously stored here and have since moved.