STORMWATER COMPLIANCE INSPECTION REPORT

State of Washington Department of Ecology
3190 – 160th Avenue SE, Bellevue, WA 98008-5452

WADOE Stormwater Compliance Inspection Form
Last updated (01/06)

Phone: (425) 649-7000
FAX: (425) 649-7098

Section A: General Data

Inspection Date	NPDES Permit #	County	Receiving Waters	Inspector	Facility Type
12/05/2006	**SO3001155D**	King	Duwamish	Megan Wisdom	Industrial

Discharges to: Surface Water ☒ Ground Water ☐ **UNANNOUNCED** Inspection

Union Pacific Railroad Co Dawson St. is covered under the General Stormwater Industrial NPDES / State Waste Discharge Permit (the General Permit). Ecology's stormwater unit has conducted an inspection at this Industrial site in the past. The purpose of this inspection is to conduct a compliance inspection per the requirement of the Revised Code of Washington (RCW) 90.48.560 and to provide technical assistance as appropriate.

Section B: Facility Data

Name and Location of Site inspected
Union Pacific Railroad Co Dawson St
402 S Dawson St
Seattle, WA, 98108 - 2257

GPS
Entrance: Lat: Long:
Discharge: Lat: Long:

Entry Time	Permit Effective Date
1:20 pm	04/07/93
Exit Time	**Permit Expiration Date**
3:30 pm	09/20/2007

On-Site Representative(s): Name(s)/Title(s)/Contact number(s) or E-mail
Vern Libby / Sr. Special Agent / Haz Mat II(206) 764-1471

Additional Participants:
Christopher Wheeler – ECY – WQ

Responsible Official(s):
Norman Siler / Manager of Environmental Field Operations
Union Pacific Railroad
5424 SE McCoulghin ave.
Portland, OR 97202
Phone: fax: **(402) 501-3397**

	Yes	No
Samples Taken?	☐	☒
Photos Taken?	☒	☐

Section C: Discharge Monitoring Reports (DMRs)

		2003			2004				2005				2006			
	Max	2nd	3rd	4th	1st	2nd	3rd	4th	1st	2nd	3rd	4th	1ST	2ND	3RD	4TH
pH	6-9		NQ	6	6	6	NQ	M	NQ	M	M	NQ	7.3	NQ		
Zinc (µg/L)	117		NQ	396	237	232	NQ	358	NQ	M	M	NQ	310	NQ		
Oil & Grease (mg/L)	15		NQ	8.5	-	-	NQ	8.4	NQ	M	M	NQ	-	NQ		
Turbidity (NTU)	25		NQ	73	52.3	39.2	NQ	107	NQ	M	M	NQ	2	NQ		
Copper (µg/L)	63.6					30.5	NQ	31.6	NQ	M	M	NQ	20	NQ		
Hardness (mg/L)	-					43.2	NQ	27.6	NQ	M	M	NQ	8	NQ		
Lead (µg/L)	81.6					-	NQ	60.6	NQ	M	M	NQ	5.15	NQ		

M = Missing (not submitted); NQ = No Qualifying Event; Err = Lab Error;

Section D: Compliance / Recommendations

The following are a list of recommended actions, based on observed conditions, that the permittee should follow in-order to comply with their NPDES General Stormwater Construction Permit and avoid violating state water quality laws:

•**Condition S9.B** of the permit requires an updated Stormwater Pollution Prevention Plan (SWPPP) that contains information on existing site conditions. Update your SWPPP map to correctly portray current conditions of the site, specifically, the presence, path, and connections of all storm drains and sanitary sewer connections onsite. Also include the current location of all sampling points at your site. Send a copy of the updated map to Megan Wisdom within two weeks of receipt of this inspection report. The mailing address is at the top of this document.

• **Condition S3.B** of the permit prohibits the discharge of process wastewater. Vehicle wash water is process wastewater and cannot be discharged to storm drains or surface waters of the state. Prevent the discharge of process wastewater, from your vehicle washing operations (see photo: PC050079.jpg & PC050099.jpg), into storm drains. Consider greatly enlarging your Packer washing pad or devising a system to eliminate oily residue and wash water from splashing out onto the lot and to nearby storm drains.

•**Condition S4.A** of the permit requires that you take quarterly samples based on specific criteria. The permit also states that even if the specific criteria cannot be met that quarter, a sample must still be taken. If there is no rain event in a quarter you still must submit a DMR with an explanation as to why a sample was not taken. If at any time stormwater flowed off of your site during a quarter, a sample should have been taken. **Not sampling stormwater as required by condition S4 is a**

violation of the permit.

•Two out of the last four recorded quarterly sampling results for turbidity were above the action level. Therefore, the permittee shall proceed with a level two response for turbidity as outlined in **permit condition S4.C**.

•Every quarterly sampling result for Zinc has been above the benchmark level. Therefore, the permittee shall proceed with a level one response for Zinc as outlined in **permit condition S4.C**.

•Implement the proper chemical handling BMPs (such as cover and containment) for all chemicals at the site.

•Consider implementing and maintaining catch basin socks in all the catch basins on site to reduce contaminants entering the storm drains.

•Good Housekeeping practices should be implemented on-site in order to reduce stormwater pollution potential from items such as stored leaky barrels (see photo: PC050100.jpg), exposed trash (see photo: PC050063), and contaminated buckets collecting stormwater on site (see photo: PC050079.jpg).

•Take the necessary precautions to reduce the potential of fuel contaminating soil and/or stormwater at the stationary fueling area. Also visually inspect for oily sheens in the stormwater captured by the diesel tank containment before discharging it to the gravel lot for infiltration.

For assistance with any of these compliance issues or recommendation regarding Best Management Practices see the Stormwater Management Manual for Western Washington, volumes IV and V (SWMM). To obtain a copy of the SWMM you may go to Ecology's website at: http://www.ecy.wa.gov/programs/wq/stormwater/manual.html

The Department of Ecology has the authority to issue formal enforcement actions including issuance of orders and civil penalties of up to $10,000 per day per violation for violations of your NPDES permit and/or state laws and regulations.

Section E: Inspection narrative and Explanation/Comments on Findings

Permit and SWPPP Review

Upon arrival, Ecology (Christopher Wheeler & Megan Wisdom) met with Jeff Neil one of the managers for the facility. Upon request Mr. Neil was able to provide, a copy of the permit and a Stormwater Pollution Prevention Plan (SWPPP) for the facility. The SWPPP did not portray an accurate depiction of existing site conditions. The Pollution Prevention Team needs to be updated due to recent staff changes, as well as an accurate map depicting the locations of sampling points and the presence, path, and connections of all storm drains and sanitary sewer connections. There is a memo in the SWPPP indicating that the drainage plans for the facility were outdated, and that a dye test would be performed to correct the maps. There was no follow up memo on this subject, or updated drainage plan to reveal the results of this dye test.

The DMR results in the SWPPP present some discrepancies with those entered into Ecology's DMR database. It was not immediately obvious why there was a discrepancy with the data and the submittals to Ecology; they will be further explored and discussed with the permittee. Records in the permittee's SWPPP show that in the 4th quarter of 2003 the sampling point was changed. Attached to this are DMR forms from presumably separate sampling points though they are labeled as the same. The SWPPP DMR for the 3rd quarter of 2005 is incorrectly filled out with the box checked indicating a sample was not taken. A sample had been taken for the 3rd quarter of 2005 but only analyzed for Fats Oil and Grease. (see photo PC050052.jpg).

After review of the SWPPP, Ecology met with Vern Libby. Mr. Libby told Ecology that we should speak with Norm Siler, and Shannon Adamson (with EMR) as they were the people that understood the permit and the SWPPP. Mr. Libby gave Ecology permission to inspect the industrial activity at the north end of the property, and at the south end off Lucille St..

North End inspection

The north end of the property (N47°33.795' by W122°20.197') consists of a gravel parking lot with parts storage, a diesel tank, a fuelling area over the tracks, and a maintenance garage over the tracks. There is an outlet from the containment around the diesel fuel tank which shows evidence of use as a discharge point (see photo: PC050053.jpg). A maintenance worker informed Ecology that when this containment became full of stormwater, a hose was attached to this outlet and the water was spread over the gravel lot to allow for infiltration into the soil.

- •Many metal and rubber parts are stored on the lot exposed to the elements. One exposed dumpster contains oily metal parts, and a used gas tank (see photo PC050063.jpg). Contaminants could leech from these materials and contaminate stormwater and soil.
- •The oil/water separator is encircled by a small fence, and is uncovered and exposed to stormwater (see photo:PC050059.jpg). Ecology is concerned that during heavy rainfall this oil/water separator may overflow and without

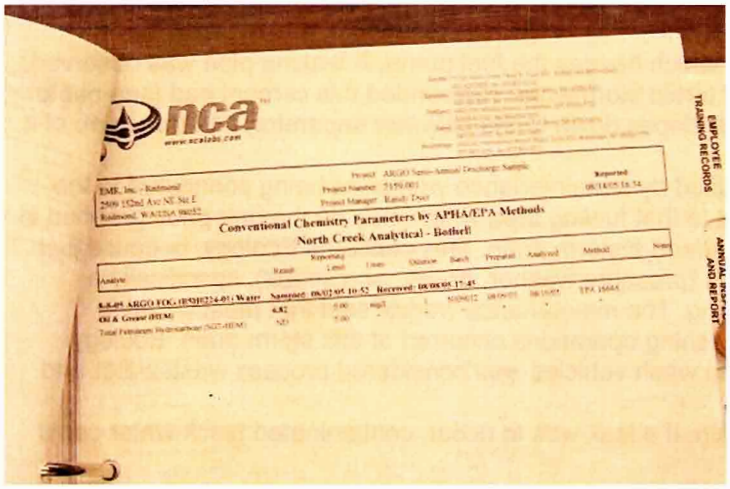
secondary containment would contaminate the surrounding soils.
•Two totes of toilet cleanser/disinfectant are stored outside near the oil/water separator on a table without secondary containment, or other proper chemical handling BMPs in place (such as drip pans, or bermed containment) (see photo: PC050067.jpg).
•Oily residue coats the cement pad and the side of the building which houses the fuel pump. A leaking pipe was observed dripping red liquid onto a saturated absorbent cloth. Puddles of turbid stormwater surrounded this cement pad (see photo PC050072.jpg). A maintenance worker said that this whole area slopes down to the oil/water separator, and that none of it runs to storm drains.
•The drain between the tracks under the fueling area was identified by a maintenance worker as being connected to the oil/water separator. The SWPPP map shows a storm drain next to that fueling area which may be the one photographed in PC050082.jpg. A maintenance worker said he believed it was indeed a storm drain. This concerns Ecology, because just slightly up slope from the storm drain were vehicle washing tools (pressure washer, hoses, and soaps), specifically a bucket filled with a red soap mixture that was close to overtopping. The maintenance worker said that most washing occurred in containment or over pervious surfaces, but small washing operations occurred at this storm drain. Ecology stressed to the maintenance worker that water and soap used to wash vehicles was considered process wastewater and was not allowed to discharge into storm drains.
•A black-water pump is stored and operated near this storm drain. If a leak was to occur, contaminated black-water could enter the storm drain.

South End inspection

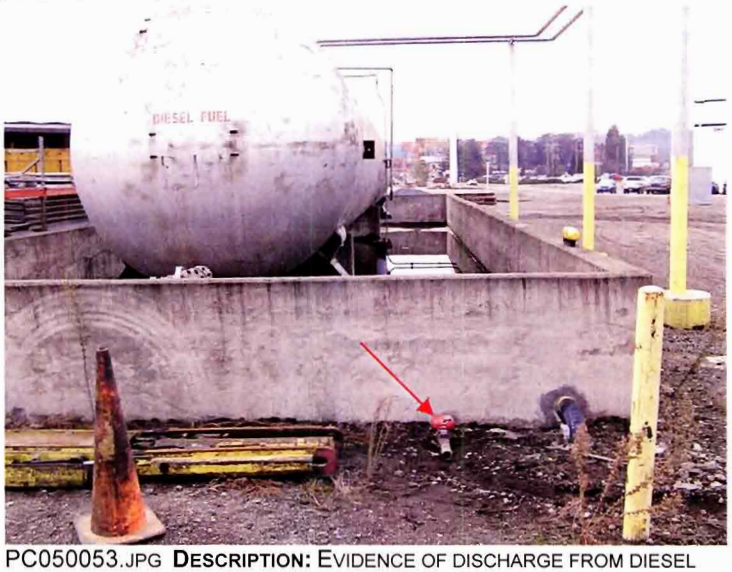
The south end of the property consists of a maintenance garage, a vehicle washing pad, tire storage, trash dumpsters, and general operation areas and parking. The entire area was on asphalt which is coated in oil and dirt.
•The four storm drains labeled on the SWPPP were identified, and drain stormwater from the contaminated asphalt. The three storm drains near the maintenance garage are fitted with a filter of unknown quality. The storm drain directly outside of the garage appears to be receiving run-off from the maintenance activities performed within the building (see photo PC050090.jpg).
•One of the supervisors, Dave, told us that vehicle maintenance was only performed in the garage. This concerned Ecology, because what seemed to be vehicle maintenance involving fuel containers and drip pans was observed outside (see photo PC050097.jpg). Dave said that the maintenance observed outside of the building was a warranty issue that an outside vendor conducted and not a usual occurrence. The ground where this was observed is heavily inundated with oily residue.
• The vehicle wash pad is contained by a curb-like berm. In the middle is a dead-end sump which receives process wastewater. This sump was overtopped, and a small, dark-black pool had formed in the wash pad. There was a pump hose in this puddle. When in operation, process wastewater would be pumped through this hose into tanks on a trailer stored within the wash pad containment (see photo: PC050099.jpg). The vehicle wash pad seems to be of an insufficient size to contain the process wastewater which splashes off the large Packer trucks. The onsite supervisor, Dave, confirmed that during the washing process it was nearly impossible to keep process wastewater from splashing outside of containment. The trailer which held the fresh water, and the pump for the pressure washer is located outside of the wash pad containment (see photo: PC050100.jpg). The whole trailer is splattered with oily residue, and its water tanks are leaking into a storm drain located directly below (see photo: PC050103.jpg). The liquid that was leaking is considered process wastewater and cannot be legally discharged into stormwater. There is thick layer of sediment deposition around this storm drain. Such large amounts of sediment build-up were not observed at the other storm drains. The sediment at this storm drain most probably derived from the cleaning operations in the area. Dirt washed from vehicles was somehow escaping containment and entering the storm drain.

Megan Wisdom 1/9/07 Megan Wisdom Date Industrial/Construction Stormwater Inspector Water Quality Program	Reviewed and approved by: Donald Seeberger 01/09/07 Donald Seeberger Date Unit Supervisor Water Quality Program

PHOTO ADDENDUM – UNION PACIFIC RAILROAD CO DAWSON ST. 12/05/06


nca
www.ncalabs.com
EMPLOYEE TRAINING RECORDS
ANNUAL REPORT AND REPORT
Conventional Chemistry Parameters by APHA/EPA Methods
North Creek Analytical - Bothell

PC050052.JPG **DESCRIPTION:** PAGE FROM DMR LAB RESULTS FOUND IN THE SWPPP WHICH SHOWS ONLY OIL & GREASE BEING TESTED FOR IN THE 3RD QUARTER OF 2005.



PC050053.JPG **DESCRIPTION:** EVIDENCE OF DISCHARGE FROM DIESEL TANK CONTAINMENT INTO GRAVEL LOT.

PC050059.JPG **DESCRIPTION:** EXPOSED OIL/WATER SEPERATOR WITH NO SECONDARY CONTAINMENT.

PBC050063.JPG **DESCRIPTION:** EXPOSED DUMPSTER CONTAINING METAL PARTS, OILY PARTS, AND A GAS TANK.

PC050067.JPG **DESCRIPTION:** CHEMICAL STORAGE WITHOUT SECONDARY CONTAINMENT OR PORPER CHEMICAL HANDLING BMPS IN PLACE (DRIP PANS).

PHOTO ADDENDUM – UNION PACIFIC RAILROAD CO DAWSON ST. 12/05/06

PC050072.JPG **DESCRIPTION:** OILY RESIDUE FROM FUELING OPERATIONS COAT THE BASE OF THE FUEL PUMP BUILDINGS AND THE PAD OF CEMENT. A LEAKING PIPE DRIPS RED LIQUID ONTO A SATURATED ABSORBANT CLOTH. OIL SHEENS SEEN THROUGHOUT THE PUDDLE.

PC050082.JPG **DESCRIPTION:** STORM DRAIN RECEIVING RUNOFF FROM CLEANING OPERATIONS PERFOMED IN CLOSE PROXIMITY (SEE PHOTO PC050079.JPG).

PC050079.JPG **DESCRIPTION:** EXPOSED SOAP MIXTURE CLOSE TO OVERTOPPING ITS CONTAINER. EVIDENCE OF WASHING TAKING PLACE IN AN AREA WHICH DRAINS TO A STORM DRAIN.

PBC050090.JPG **DESCRIPTION:** MAINTENANCE GARAGE WITH TURBID RUNOFF TO STORM DRAIN.

PC050097.JPG **DESCRIPTION:** WHAT APPEARS TO BE VEHICLE MAINTENANCE WORK BEING PERFORMED OUTSIDE WITHOUT CONTAINMENT.

PC050099.JPG **DESCRIPTION:** PACKER TRUCK VEHICLE WASH PAD.

PHOTO ADDENDUM – UNION PACIFIC RAILROAD CO DAWSON ST. 12/05/06

PC050100.JPG **DESCRIPTION:** FRESH WATER AND PRESSURE WASHER STORED ON A TRAILER OUTSIDE OF WASHING PAD CONTAINMENT. NOTICE OILY RESIDUE ON TRAILER AND THE GROUND BELOW, AS WELL AS A LEAK.

PC050053.JPG **DESCRIPTION:** STORM DRAIN, LOCATED UNDER PREASURE WASHING TRAILER, RECEIVING PROCESS WASTEWATER FROM LEAK. THICK SEDIMENTATION DEPOSITION HAS ACCUMULATED AROUND THE STORM DRAIN.