



STORMWATER COMPLIANCE INSPECTION REPORT

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

WADOE Stormwater

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Section A: General Data

| | | | | | |
|--|------------------------------------|----------------|------------------------------------|-------------------------------|-----------------------------|
| Inspection Date 3/22/2019 | NPDES Permit # WAR001155 | County King | Receiving Waters Duwamish River | Inspector(s) Ben Billick | Facility Type Industrial |
| Discharges to: Surface Water <input checked="" type="checkbox"/> Ground Water <input type="checkbox"/> | | | | UNANNOUNCED Inspection | |

Section B: Facility Data

| Name and Location of Site Inspected | Lat & Long | Entry Time | Permit Effective Date |
|--|---|--|--------------------------------------|
| Union Pacific Railroad Argo Yard 402 South Dawson Street Seattle, WA 98108 | Latitude: 47.55565 Longitude: -122.32901 | 9:30 AM | 01/01/2015 |
| On-Site Representative(s): Name(s)/Title(s)/Contact number(s) or E-mail Damon J Larkin, Manager Intermodal Terminal Operations Phone: (206) 764-1443, Email: djlarkin@up.com | | Exit Time 10:00 AM | Permit Expiration Date 12/31/2019 |
| Responsible Official(s): Bryan K. Robinson, Manager Environmental Field Operations 1035 Bethel Drive Eugene, OR 97402 Phone: (541) 341-5528, Email: bkrobins@up.com | | Additional Participants: -Chris Wilkerson, Seattle Public Utilities Environmental Compliance Inspector | |
| | | Samples Taken? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| | | Photos Taken? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |

Section C: Summary of Findings/Comments

BACKGROUND

Union Pacific Railroad (UPRR) Argo Yard is covered under Ecology's Industrial Stormwater General Permit (ISGP #WAR001155). Ecology's stormwater unit has conducted an inspection at this industrial site in the past. Ecology's most recent inspection at this facility was on February 21, 2019. Following the February 2019 inspection, Ecology issued a Warning Letter and Inspection Report to UPRR on March 14, 2019 citing the following violations:

- Violation of ISGP condition S3.A.4.a.ii for failure to correct SWPPP deficiencies within 30 days of receiving written notice from Ecology. On April 18, 2018, Ecology issued a Warning Letter and Inspection Report requiring UPRR to update their SWPPP to reflect the fact that the ISGP applies to all portions of the site, not just the maintenance and fueling areas. These updates were not completed as of February 21, 2019.
- Violation of ISGP condition S4.B.2.c for failure to sample each distinct point of discharge off-site except as otherwise exempt from monitoring as a "substantially identical discharge point" per S3.B.5.b.

The full March 14, 2019 Warning Letter and Inspection Report were sent to the Permittee via email and post, and copies are available on Ecology's Permitting and Reporting Information System (PARIS) website. The purpose of this inspection was to follow-up on the violations cited in the March 14, 2019 Warning Letter and Inspection Report; determine the facility's compliance with the ISGP; and provide technical assistance as appropriate.

This inspection was conducted jointly with Seattle Public Utilities (SPU) Environmental Compliance Inspector Chris Wilkerson.

INSPECTION/OBSERVATIONS

Upon arrival, Ecology Inspector Ben Billick and SPU Inspector Chris Wilkerson met with Bryan Robinson, UPRR Manager of Environmental Field Operations. We discussed UPRR's follow-up to the compliance issues noted during the inspection on February 21, 2019 and conducted an inspection of targeted areas on-site. As this was a follow-up inspection, we did not review the facility's compliance paperwork and we did not conduct a full inspection of the entire site.

Site Inspection and Discussion:

- B. Robinson stated that UPRR is currently working to update their SWPPP to address the deficiencies noted in the Ecology Warning Letter and Inspection Report dated March 14, 2019. UPRR expects to have the SWPPP updates completed within the 30-day timeframe given in the March 14 Inspection Report. B. Robinson confirmed that the updated SWPPP will address all drainage basins on-site and that the updated sampling plan will cover all discharge points. B. Robinson also stated that UPRR is also currently investigating the individual drainage basins on-site to ensure that they are accurately defined and mapped.
- We inspected a portion of the site northwest of the 4th Avenue overpass where we observed evidence of turbid

discharge from the facility perimeter on February 21, 2019. Since the February inspection, UPRR has added gravel along the site perimeter at this location in order to cover exposed soil and increase the grade to prevent runoff. Personnel have begun parking equipment on the new gravel, causing compaction in the area. B. Robinson stated that UPRR plans to add more gravel, and will install k-rails to prevent future vehicle and equipment parking. B. Robinson also informed us that the site receives run-on from the 4th Avenue overpass in this area, which contributes to the issue of runoff from the perimeter of the facility. UPRR is currently looking at options to control the run-on, and is considering installing a curb to help contain the run-on in a gravel area where it can infiltrate.

- Two five-gallon buckets that appeared to contain paint were observed on the ground near the main office. The lids of both buckets were broken. B. Robinson stated that they were likely household waste brought on-site by an employee. B. Robinson immediately collected the buckets and put them in his vehicle.
- No new/additional violations or compliance issues were observed.

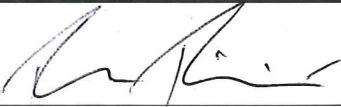
Section D: Compliance Requirements and Recommendations

- Continue work to update the SWPPP, site map, and discharge monitoring plan and procedures in accordance with the ISGP compliance requirements described in Ecology's Warning Letter and Inspection Report dated March 14, 2019. Submit the updated SWPPP to Ecology by the deadline established in the Inspection Report.
- Ensure that all chemical liquids, fluids, and petroleum products are stored in secondary containment in accordance with permit condition S3.B.4.b.i.4.a.

For questions about this report, please contact Ecology Inspector Ben Billick at bbil461@ecy.wa.gov, (425) 649-7059, or Dept. of Ecology, Water Quality Program, 3190 160th Ave SE, Bellevue, WA. 98008.

For assistance with any of these compliance issues or recommendations 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.


Ben Billick
Senior Water Quality Inspector
Department of Ecology, Water Quality Program

4/9/2019
Date

PHOTO ADDENDUM – UPRR ARGO YARD 3/22/2019

001 DESCRIPTION: PHOTO TAKEN DURING INITIAL 2/21/19 INSPECTION SHOWING EVIDENCE OF TURBID RUNOFF FROM THE PERIMETER OF THE FACILITY.



002 DESCRIPTION: GRAVEL ADDED ALONG PORTION OF FACILITY PERIMETER SHOWN IN PHOTO 001 IN AN EFFORT TO RAISE THE GRADE AND PREVENT RUNOFF.



003 DESCRIPTION: DOWNSPOUTS FROM 4TH AVE OVERPASS DRAIN ONTO THE SITE, CONTRIBUTING TO RUNOFF FROM THE FACILITY PERIMETER.



004 DESCRIPTION: TWO FIVE-GALLON PAINT BUCKETS WITH BROKEN LIDS AND NO SECONDARY CONTAINMENT. BUCKETS WERE IMMEDIATELY MOVED OFF THE GROUND.

