From:	Tran, Jeanne (ECY)
To:	Peter Kelly
Cc:	James@northlakeshipyard.com; Kannadaguli, Monika (ECY); Dobrowski, Evan (ECY); Miller, Jared (ECY); Onstad, Gretchen (ECY)
Subject:	Request based on Inspection conducted at Northlake Shipyard on January 9, 2023
Date:	Thursday, January 19, 2023 4:18:27 PM

Dear Mr. Peter Kelly,

The Department of Ecology inspected Northlake Shipyards on January 9, 2023. There were three Ecology inspectors, including myself, who met with your staff (James Kelly and Mick Maddock) for almost 6 hours. We observed several permit violations including failure to implement best management practices required by your current NPDES Permit (WA0030864). I'm in the process of working with other inspectors to draft the inspection report with photos. It will take some time before the inspection report can be finalized and signed, then I can send it to you. I want to bring it to your attention that there will be enforcement taken to require corrective actions for those permit violations observed. In the meantime, I'm requesting that you take immediate action to enforce your tenants' and contractors' activities conducted on your waterfront property to prevent pollution from entering the receiving water, Lake Union. Ecology holds Northlake Shipyard to comply with the requirements in NPDES Permit No. WA0030864. Ecology's enforcement authority for NPDES permits is governed by Chapter 173-220-230 of the Washington Administrative Code (WAC). Since Northlake Shipyard allows tenants to occupy its property and contractors to come on-site to conduct work, it is therefore Northlake Shipyard's responsibility to enforce their activities to comply with the permit requirements.

At the minimum, please take immediate action to correct the following items:

1. Do not allow leaky cars or trucks to drive on your property. Ecology inspectors observed two fresh oily stains on the West Pier (one near drydock 2 and one in the west driveway near the green dumpster), and one oily stain on East Pier after the red truck that belongs to the Aztec tenant drove by. Photos taken from these locations will be available as part of the inspection report. If repair of the leak is not possible immediately, a drip pan should be placed underneath the leaky vehicle at all times.
2. Haul out any wastewater collected in the 2 storage tanks on-site when they are nearly full, especially before the shift ends on Friday, to provide storage capacity for contaminated stormwater or unanticipated wastewater encountered during the weekend. Drydock sumps must be cleaned and capped to prevent stormwater from entering them when no work is occurring during the weekend. Ecology inspectors observed wastewater with a layer of heavy oily sheen that was overflowing from one of the drydock sumps on drydock #2, draining directly into Lake Union. Wastewater in the sump was not able to be pumped to the storage tanks because the tanks were full.
3. Move all buckets and drums containing liquid away from shore along the edge of the receiving water and piers. Ecology inspectors observed multiple 55-gallon drums containing liquid stored on the I-90 Float Pier with no secondary containment. 55-gallon drums and 5-gallon buckets containing liquid were found at various locations outside of the 3-sided covered shed belonging to one of the tenants, located at the end of the I-90 Float Pier. Multiple 5-gallon buckets and a couple of 55-gallon drums containing liquid without secondary containment were also found stored under the covered structure next to the houseboat tenant.

4. Provide a steel plate under the metal cutting table to collect steel debris and fines. After metal cutting is complete, metal debris must be collected through sweeping or vacuuming. Ecology inspectors observed a metal cutting table with cutting tools setup on I-90 Float Pier near a shed belonging to one of the tenants. Metal pieces and debris were observed on the Pier pavement. Since the ground was wet, it was difficult to collect the debris. Shortly after this was pointed out to Mr. Maddock, it rained heavily and the metal debris was washed off into Lake Union.

More items will be documented in the inspection report. Please address the above-mentioned items immediately. If you have any questions, please don't hesitate to contact me.

Thank you,
Jeanne

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DEPARTMENT OF
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Ecology's Northwest Regional Office has moved to Shoreline:

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