

		<h2 style="text-align: center;">STORMWATER COMPLIANCE INSPECTION REPORT</h2> <p style="text-align: center;">State of Washington Department of Ecology P.O. Box 330316, Shoreline, WA 98133-9716</p>			WADOE Stormwater Compliance Inspection Form Phone: (206) 594-0000										
Section A: General Data															
Inspection Date 7/18/2023	NPDES Permit # WAG030009	County King	Receiving Waters Puget Sound	Inspector(s) Evan Dobrowski & Megan Junod	Facility Type Boatyard										
Discharges to: Surface Water <input checked="" type="checkbox"/> Ground Water <input type="checkbox"/>				ANNOUNCED Inspection											
Section B: Facility Data															
Name and Location of Construction Site Inspected CSR Marine South 22501 Dock St S Des Moines, WA 98198 <div style="text-align: right; margin-top: 10px;"> GPS: Lat: 47.400345 Long: -122.328689 </div>				Entry Time 11:30AM	Permit Effective Date 9/01/2022										
				Exit Time 2:00PM	Permit Expiration Date 8/31/2027										
Certified Erosion and Sediment Control Lead (CESCL): (or on-site rep.) <div style="border: 1px solid black; height: 20px; width: 100%;"></div>				Additional Participants: <table style="width: 100%; border-collapse: collapse;"> <tr> <td></td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td>Samples Taken?</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> <tr> <td>Photos Taken?</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>				Yes	No	Samples Taken?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Photos Taken?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Responsible Official(s): Scott Anderson 22501 Dock St S Des Moines, WA 98198 Phone: (360) – 201 – 0793		Jeremiah Jewell 22501 Dock St S Des Moines, WA 98198 Phone: (206) – 632 – 2001													
Section C: Summary of Findings/Comments															
<u>BACKGROUND</u>															
CSR Marine South is covered under Ecology's Boatyard General Permit (BGP #WAG03009). The purpose of this inspection was to conduct a compliance inspection and to provide technical assistance as appropriate. The facility is having exceedances with copper and not sampling for NWTTPH-Dx.															
<u>INSPECTION/OBSERVATIONS</u>															
<p>Upon arrival at CSR Marine South, we met with Jeremiah Jewell and began a site walk. We started the site walk at the wash pad discussing how vessels are washed and operating procedures of the wash pad, cleaning, and wastewater disposal. Jeremiah opened the oil water separator, valve control, and wastewater tank lids for us to visually see the piping infrastructure. Afterwards we went to the StormwaterRx unit where I informed Jeremiah Jewell that the sample valve was installed on the wrong side and needs to be moved to the other side of the unit after the overflow water is commingled. After discussing the sample port move, we headed to the north side of the facility where vessels were being worked on both on and off tarps. Throughout the site most vessels with active work occurring did have tarps below; but it was an issue in some locations. We opened up the storage sheds along the north side of the facility and found several 5-gallon buckets of liquid chemicals not in secondary containment which I explained to Jeremiah was a violation. Jeremiah thought that if it was an unopened container, it was not required to be in secondary containment so we discussed this and he is now aware that all liquid chemicals regardless of whether they are open or closed, new or old, must be in secondary containment. There were several other areas throughout the site where secondary containment was not adequate which will need to be addressed.</p> <p>During the site walk we visited three locations where there were temporary structures installed on the asphalt. In these structures the facility has not been utilizing tarps or tenting during work and there is large amounts of dust accumulation on the pavement. In these areas we discussed the need to clean the pavement with a pressure washer with vacuum attachment to suck up the pressure wash water and to immediately begin using tarps and tenting based on the work that is occurring at the time. In the northeast section of the yard we also found one catch basin that a majority of the yard drains to. At this catch basin large amounts of solids accumulation was present and we discussed the need to have this catch basin cleaned more frequently than others throughout the yard to prevent dust and debris from entering the stormwater conveyance system.</p> <p>After the site walk, we reviewed some Stormwater Pollution Prevention Plan (SWPPP) supporting documents and found that the SWPPP certification page had not been signed. Jeremiah Jewell signed the SWPPP certification page before we left. I explained to Jeremiah it was required that the SWPPP certification be signed after every level corrective action and any SWPPP modifications. During this review we also found that the facility was having their lab run fats, oils, and grease samples rather than NWTTPH-Dx. We discussed this with Jeremiah, and he will be explained to the lab what is needed for sampling. The facility also was not using a proper inspection report for all inspections and was often just documenting who conducted the inspection and when. I explained to Jeremiah that this is better than nothing but does not meet the requirements for inspections in the permit.</p>															
Document Review: <ul style="list-style-type: none"> Stormwater Pollution Prevention Plan must be updated and the SWPPP certification signed. 															

- Facility needs to begin sampling for NWTPH-Dx and detailing this to the lab.
- Facility needs to fill out the inspection report form during every weekly facility inspection.

Facility Inspection:

- Facility must begin sampling at the new sample location beginning immediately.
- Facility must implement secondary containment requirements.
- Facility should cleanup and conduct general housekeeping to remove paints and other debris from pavement with a pressure washer and vacuum attachment.
- Facility must begin using tarps under all boats where work is occurring that could include sanding, scraping, or painting.
- Facility must use vacuum sanders during all sanding operations.

Section D: Compliance Requirements and Recommendations

General BYGP Compliance Requirements

- **Violation:** In accordance with **permit condition S3.D.2** Permittees must securely anchor or fasten drop cloths, tarpaulins, structures, drapes, shrouding or other protective devices around the vessel, as necessary, to collect all such materials. These protective devices should be secured in such a way that they remain in place during all weather conditions. The Permittee must routinely cleanup all collected materials or wastes and manage them appropriately to prevent their release into the environment and entry into waters of the State.
 - **Required Corrective Action:** CSR Marine South had several areas where work was being conducting in upland areas which required sanding, painting, and other removal activities. In these areas tarps or similar were not being used on the ground or hanging from the vessel for tenting. For all vessels coming into the facility immediately begin utilizing tarps under vessels where work is or will be conducted. Within 15 days of receipt of this inspection report any vessels that are currently being worked on must have tarps on the ground below the work area and tenting if sanding operations are occurring.
- **Violation:** In accordance with **permit condition S6.E**, The Permittee must conduct and document a visual inspection of the entire site once per week when boatyard activities are occurring at the site. These visual inspections must occur at both the industrial areas and dry boat storage, or non-industrial areas as defined in S6.C within or areas contiguous with an industrial area.
 - **Required Corrective Action:** CSR Marine South did have documentation that weekly inspections were occurring onsite; however, the proper form was not being used to indicate any details in the weekly inspections only a staff member name and date was documents. Immediately begin conducting weekly inspections as required by the permit and supporting documents.
- **Violation:** In accordance with **permit condition S8.B.3.f.ii.1**, store all hazardous substances, petroleum/oil liquids, and other chemical solids or liquid materials that have potential to contaminate stormwater on an impervious surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed container volume or 110% of the volume contained in the largest container, whichever is greater, or use double-walled tanks.
 - **Required Corrective Action:** CSR marine South had several areas throughout the site where secondary containment measures were not installed. Within 30 days of receipt of this inspection report have secondary containment installed throughout the facility.

For questions about this report, please contact Ecology Inspector Evan Dobrowski at edob461@ecy.wa.gov, (425) 213-4230, or Dept. of Ecology, Water Quality Program, PO Box 330316, Shoreline, WA 98133-9716.

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.

Evan Dobrowski

Evan Dobrowski
Industrial Stormwater Inspector and Compliance Specialist
Water Quality Program

Date: August 2, 2023