



Permit Compliance Inspection Report

Water Quality Program

Bellingham Field Office

A. General Information

Facility Name & Address: Seattle Yachts Service (North Yard)
2417 T Ave
Anacortes, WA 98221

Permit Type: Boatyard General Permit Permit Number: WAG994608

Permit Effective Dates: 9/1/2022 to 8/31/2027

Date(s) of Inspection: 4/18/2024

Inspection Duration: 11:04 AM to 11:55 PM

Discharge to: Surface water

Receiving Water: Fidalgo Bay

Type of Inspection: Announced
Technical Assistance Visit

Weather: Sunny, 55°F

Photographs Taken: Yes No Samples Taken: Yes No

B. Personnel Information

Ecology Representative(s): Sylvia Graham

Facility Representative(s): Dave Habenicht, Facility Manager
Phone: 360-770-7098 Email: dave.h@seattleyachts.com
Greg Moses

Responsible Party/Official: Brent Moore
2417 T Ave
Anacortes, WA 98221
Phone: 360-293-8200 Email: brent@seattleyachts.com

Inspector Signature

A handwritten signature in blue ink that reads "Sylvia Graham".

5/10/2024

Sylvia Graham (Author)
Stormwater Permit Manager

Date

C. Facility Description & Background

Seattle Yachts Service (SYS) is conditionally authorized to discharge stormwater and wastewater under Washington's Boatyard General Permit (BYGP) No. WAG994608. The BYGP is a National Pollutant Discharge Elimination System (NPDES) and a State Waste Discharge permit. SYS's site-specific permit coverage conditionally authorizes the discharge of stormwater to surface water at monitoring point SW1 and the discharge of process wastewater to the City of Anacortes publicly owned treatment works (POTW) at monitoring point POTW.

On 4/1/2024, I notified Dave Habenicht, Facility Manager, that this facility triggered a Level 2 Response by exceeding benchmarks for copper and zinc three times in 2023 during the months of January, May, and November. On 4/9/2024, he submitted a Level 2 Source Control Report and subsequently requested a technical assistance visit to help the facility better understand the requirements of the BYGP. D. Habenicht recently joined the company in early 2024.

SYS bought this facility in June 2022. The site was previously Northwest Marine Center (BYGP No. WAG994480) from May 2020 to June 2022, and Marine Service Center (BYGP No. WAG030095) prior to May 2020. This was Ecology's first visit to this site since SYS began operations.

This facility primarily conducts boat commissioning: assembling new boats in preparation for sale. This facility does minimal service or repair and they do not allow do-it-yourself work by boat owners.

D. Inspection Narrative & Observations

1. Permit Documentation and Records Review

D. Habenicht and I reviewed permit documentation at the SYS office at 3116 V Place. D. Habenicht said he's currently updating the Stormwater Pollution Prevention Plan (SWPPP) and Spill Plan. He will email those to me in the next few weeks. He presented weekly inspection reports which use the Ecology template and met permit conditions.

Regarding staff training, D. Habenicht said trainings had occurred, but he has not found any records. We discussed what should be kept for training records as described in Permit Condition S8.B.3.g. We also discussed other records that must be kept on site per Condition S9.B.1. It is adequate for records to be kept electronically, as long as they are readily accessible on site.

As noted above, SYS discharge monitoring reports (DMRs) indicate the facility triggered a Level Two Response in 2023 by exceeding benchmarks for copper and zinc three times. The copper benchmark was exceeded in January, May, and October 2023, with the third exceedance reported on 11/29/2023. The zinc benchmark was exceeded in January, May, and November 2023, with the third exceedance reported on 12/28/2023. SYS failed to submit Level Two Structural Source Control Reports for copper and zinc within three months of reporting the third value above benchmark, in accordance with Permit Condition S7.A.2.e. Following my notification on 4/1/2024, D. Habenicht submitted Level Two Structural Source Control Reports for copper and zinc on 4/9/2024. SYS must fully implement the Level Two Structural Source Control Reports within 6 months of reporting the third value above benchmark, in accordance with Permit Condition S7.A.2.f. Therefore, SYS must

implement the Level Two Reports for copper and zinc by 5/29/2024 and 6/28/2024, respectively. If it is not feasible to meet these deadlines, SYS must submit an extension request to S. Graham.

SYS submitted the code for Analysis Not Conducted on the DMRs for March and April 2023. SYS failed to enter the sampling data on the January 2024 DMR, although they did upload a lab report with sampling data.

The DMRs submitted with sampling data during this permit cycle state pH is measured in the field on site; however, during my meeting with D. Habenicht, he stated he did not have a pH meter or test strips. SYS must be able to demonstrate how pH has been measured.

D. Habenicht asked if either the South or North yards were subject to additional requirements due to potentially discharging into a Puget Sound Sediment Cleanup Site, per Condition S2.E.3. Ecology originally issued a letter to SYS stating they were subject to the additional requirements in Condition S2.E.3; however, this letter was issued in error and a correction letter will be issued in the near future which will state SYS is not subject to Condition S2.E.3.

2. Site Walkthrough

D. Habenicht escorted me through the site. I observed two above ground storage tanks, one for diesel and one for gasoline, located at the west side of the building. The tanks are surrounded by a locked fence, which D. Habenicht unlocked for us to go inside. I observed dark stains under a valve for one of the tanks, indicating past spills or leaks (Photo 1). This area lacked a spill kit; D. Habenicht said he would place one there. We also discussed keeping a drip pan in this area for use during fuel transfers to catch spills or leaks.

We looked in five of six catch basins on site. All were clean and free of sediment, except a small one at the northwest corner of the building. This small catch basin did not have a sump below the outlet and sediment was accumulated at the bottom and into the outlet (Photo 2). We did not look at a second small catch basin at the center of the north side of the building because of water ponded all around it. D. Habenicht said he thinks the outlet pipe is collapsed and blocking drainage. He is working to address this. This catch basin was missing from the site map.

Greg Moses, SYS staff, met us at the wash pad and described the wastewater treatment system as follows: The wash pad drains into a trench drain on the pad, which drains north to a single-chamber vault. G. Moses said the vault can hold the volume of wastewater from approximately one boat wash. After each wash, a pump in the vault is turned on to pump wastewater into the above-ground flocculation tank (Photos 3-4). The flocculation tank will become near full after a few washes, at which point G. Moses adds flocculant to the tank from a port at the top of the tank. He turns on air circulation to mix the flocculant for approximately 8 hours or overnight. Then he turns off the air and lets the flocculated material settle to the bottom of the tank for 24 hours or more. After that time, a valve is opened to discharge treated water from near the middle of the tank to an underground connection to a sewer line and manhole just northwest of the tank. The settled solids are emptied from the bottom of the tank into a perforated plastic bin lined with thick filter fabric. This plastic bin is placed back on the wash pad to drain remaining water, which flows back into the treatment system. The solids are disposed of with Safety Kleen. G. Moses said he collects the wastewater sample from the top of the flocculation tank; however, that does not represent the water discharging from the treatment tank. The sample must be collected where it discharges from their system.

We looked inside the vault and observed the outlet to the sewer was not plugged. We did not see a plug in the vicinity. G. Moses said it should be plugged and he didn't know what happened to the plug.

We looked inside the sewer manhole northwest of the flocculation tank (Photos 5-6). The water inside had a floating layer of light brown material. I observed two inlets coming into the manhole from the southeast, likely one of which comes from the vault. We observed a T-baffle outlet to the northwest, which had a flexible plastic pipe going into it. The other end of the flexible pipe was under water in the manhole and we could not see where it connected; it did not connect to the two inlets from the southeast. This manhole should be vacuumed out to investigate all the connections to and from the manhole.

We walked along the southern site boundary and observed the following:

- A 5-gallon bucket of degreaser and a spray applicator sitting outside without cover or secondary containment (Photo 7). Degreaser should not be sprayed on outdoor surfaces where the residue will runoff with stormwater. Use dry absorbents to clean up spills and leaks.
- Three fuel canisters outside without cover or secondary containment (Photo 8). Two of the three canisters were full.
- An enclosed materials storage shed, which held IBC totes of used oil and coolant, and drums and smaller containers of other chemicals (Photos 9-10). Most drums were placed over secondary containment pads, and some of the smaller containers were empty. The IBC totes did not have secondary containment.

E. Corrective Actions Required for Compliance

Comply with Condition S2.D and Table 3: Stormwater Sampling Requirements

Start monitoring pH on site according to Table 3 of the permit. Permittees shall use either a calibrated pH meter or narrow-range pH indicator paper with a resolution not greater than ± 0.5 SU.

Comply with S6.A.2.a: Sample Locations

The Permittee shall designate sampling locations at the points where it discharges stormwater or wastewater associated with boatyard activities off-site.

- 1) Update the sampling location for pressure wash wastewater. SYS currently collects the wastewater sample from the top of the flocculation tank; however, this may not represent the water quality of the water leaving the tank from the outlet. SYS must designate a location to collect a representative sample. Starting in June 2024, begin sampling wastewater from a more representative location, such as the sanitary sewer manhole located northwest of the wastewater treatment system, or a sample port installed between that manhole and the flocculation tank outlet. Update your SWPPP and site map accordingly.
- 2) Vacuum out the sewer manhole to identify and map the related connections.
- 3) The facility must have a method to plug the vault outlet during pressure washing activities. Install a valve or other system that allows staff to easily switch between a closed and open vault.

Comply with Condition S7.A.2.f Level Two Response

Fully implement the Level Two Structural Source Control Reports for copper and zinc by 5/29/2024 and 6/28/2024, respectively. If it is not feasible to meet these deadlines, submit an extension request to S. Graham.

Comply with Condition S8: Stormwater Pollution Prevention Plan (SWPPP)

Update the SWPPP to meet all requirements of Condition S8. The SWPPP should be customized to describe your specific site and operational, structural, and treatment best management practices (BMPs). Update the Site Map to add the small catch basin at the center of the north side of the building. Email the updated SWPPP and Site Map to S. Graham for review.

Comply with Condition S8.B.3.e Preventive Maintenance

Maintain ponds, tanks/vaults, catch basins, swales, filters, oil/water separators, drains, and other stormwater drainage/treatment facilities in accordance with the maintenance standards set forth in the applicable Stormwater Management Manual, including the two catch basins along the south fence line. Clean out sediment and set a schedule to check sediment levels and clean out when sediment reaches 60% of the sump volume beneath the outlet.

- Repair the damage to the conveyance system along the north side of the building which led to the ponded water in that area.
- Clean out sediment from the two small catch basins on the north side of the building.

Comply with Condition S8.B.3.e.iv: Preventive Maintenance

Clean up spills and leaks immediately (e.g., using absorbents, vacuuming, etc.) to prevent the discharge of pollutants.

Comply with Condition S8.B.3.f.ii items 1 and 2: Material storage requirements

Store all hazardous substances, petroleum/oil liquids, and other chemical solid 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. Prevent precipitation from accumulating in containment areas by using a roof or equivalent structure or include a plan on how it will manage and dispose of accumulated water if a containment area cover is not practical.

Comply with Condition S8.B.3.f.ii.3: Spill kits

Locate spill kits within 25 feet of the diesel and gasoline tanks, as well as all stationary fueling stations, fuel transfer stations, mobile fueling units, and used oil storage/transfer stations. See Condition S8.B.3.f.ii.3 for minimum contents of spill kits for these areas.

Comply with Condition S8.B.3.f.ii.6: Drip pans

Use drip pans or equivalent containment measures during all petroleum transfer operations.

Comply with Condition S8.B.3.f.ii.9: Spill log

Maintain a spill log that includes the following information for chemical and petroleum spills: date, time, amount, locations, and reason for spills; date/time cleanup completed, notifications made and staff involved.

Comply with Condition S8.B.3.f.iii: Employee Training

The SWPPP shall include BMPs to provide SWPPP training for employees who have duties in areas of industrial activities subject to this permit. At a minimum, the training plan shall include:

- i. An overview of what is in the SWPPP.
- ii. How employees make a difference in complying with the SWPPP and preventing contamination of stormwater.
- iii. Spill response procedures, good housekeeping, maintenance requirements, and material management practices.
- iv. How the Permittee will conduct training.
- v. The frequency/schedule of training. The Permittee shall train employees annually, at a minimum.
- vi. A log of the dates on which specific employees received training.

Comply with Condition S9.B.1 Records Retention

The Permittee shall retain the following documents onsite for a minimum of five years:

- a) A copy of this permit.
- b) A copy of the permit coverage letter.
- c) Records of all sampling information specified in Condition S9.C.
- d) Inspection reports including documentation specified in Condition S6. E.
- e) Any other documentation of compliance with permit requirements.
- f) All equipment calibration records.
- g) All BMP maintenance records.
- h) All original recordings for continuous sampling instrumentation.
- i) Copies of all laboratory reports as described in Condition S6.D.
- j) Copies of all reports required by this permit.
- k) Records of all data used to complete the application for this permit.

Electronic copies are adequate if they can be accessed upon request on site.

If you have any questions or concerns regarding this inspection report, please contact Sylvia Graham at 360-927-4900 or sylvia.graham@ecy.wa.gov.

ADA Accessibility

The Department of Ecology is committed to providing people with disabilities access to information and services by meeting or exceeding the requirements of the Americans with Disabilities Act (ADA), Section 504 and 508 of the Rehabilitation Act, and Washington State Policy #188.

To request an ADA accommodation, contact Ecology by phone at 360-407-6831 or email at ecyadacoordinator@ecy.wa.gov. For Washington Relay Service or TTY call 711 or 877-833-6341. Visit [Ecology's website](#) for more information.



Photo 1 [IMG_0275]

Description: Dark stains on the concrete below a valve on the fuel tank at the west side of the site, indicating past leaks or spills.



Photo 2 [IMG_0276]

Description: View inside the small catch basin at the northwest corner of the building. Sediment was accumulated at the bottom of the basin and into the outlet.



Photo 3 [IMG_0282]

Description: Flocculation tank for treating pressure wash wastewater, located at the east side of the site. Wastewater from the wash pad (out of the photo to the right) flows to the vault in the foreground and then is pumped into the flocculation tank. Photo faces east.



Photo 4 [IMG_0283]

Description: Closer view of the wastewater treatment system. The pipe on the right brings untreated water from the vault into the flocculation tank. The black pipe on the left brings treated water from the tank to an underground connection to the sewer line.



Photo 5 [IMG_0277]

Description: Sewer manhole to which the treated wastewater from the flocculation tank flows. Manhole is northwest of the flocculation tank. Photo faces west.

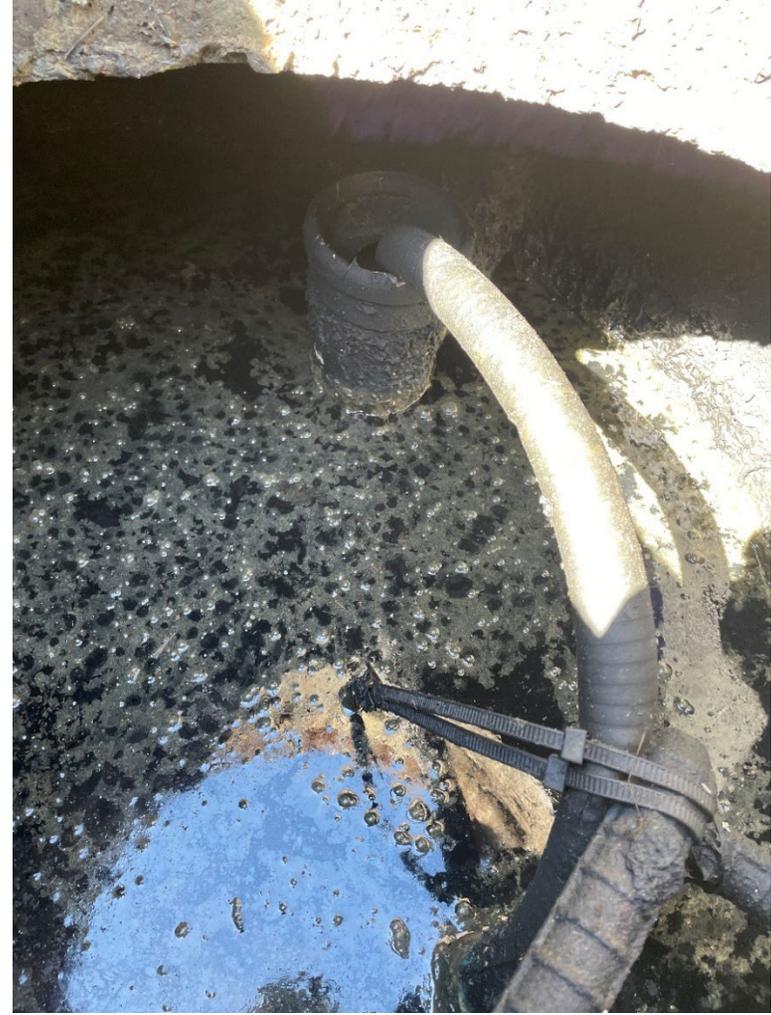


Photo 6 [IMG_0278]

Description: View inside sewer manhole shown in Photo 5. The water inside had a floating layer of light brown material. The underwater connection of the flexible piping was unknown.



Photo 7 [IMG_0285]

Description: A 5-gallon bucket of degreaser and spray applicator sitting outside without cover or secondary containment at the south side of the site. Photo faces west.



Photo 8 [IMG_0286]

Description: Three fuel canisters placed outside without cover or secondary containment, located at the south side of the site. Two of the three canisters were full. Photo faces south.



Photo 9 [IMG_0287]

Description: View inside left side of storage shed at south side of the site. The IBC tote was labeled “coolant” and was lacking secondary containment. Most of the smaller containers were empty.



Photo 10 [IMG_0288]

Description: View inside right side of storage shed shown in Photo 9. The IBC tote was labeled “used oil” and was lacking secondary containment. Most of the smaller containers were empty.