

INSPECTION REPORT

Inspection Entry Date/Time	06/07/2024 09:00 AM (PT)	Announced: Yes	
Inspection Exit Date/Time	06/07/2024 02:30 PM (PT)	Access: Granted	
Weather	55°F, Sunny		
Media	Water		
Statutes/Programs	Clean Water Act, NPDES, Stormwater – Industrial		
Type of Inspection	Compliance Evaluation Inspection		
Permittee Name	Mark Reid		
Facility or Site Name	Alaska Marine Trucking, LLC		
Facility/Site Physical Address	3295 Tongass Avenue		
City, State, Zip Code	Ketchikan, Alaska 99901		
Borough	Ketchikan Gateway		
Facility GPS Coordinates	55.35374, -131.68862		
Mailing Address	6520 Kulis Drive		
City, State, Zip Code	Anchorage, Alaska 99502		
FRS ID	110067188215		
Permit Number	AKR06AC74		
SIC	4212 (Local Trucking, without Storage)		
Lead Inspector:			
Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252
Supervisor Review:			
Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – Opening Conference

I arrived at the Alaska Marine Trucking, LLC (the “Site”, “Facility”, or “AMT”), located at 3295 Tongass Avenue, Ketchikan, Alaska at 09:00 AM (PT) on 06/07/2024 for an announced inspection. I presented my credentials to Ilir Zhuta and informed him I was there to determine compliance with the Clean Water Act (CWA), and the facility’s National Pollutant Discharge Elimination System (NPDES) permit, permit # AKR06AC74. This report is based on information supplied by facility representatives, direct observations made by me, and records and reports maintained by the facility. In addition, information gathered prior to, or after, the Inspection from a review of EPA, State, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Raymond Andrews	Lead Inspector	Yes	Yes
Alaska Marine Trucking	Ilir Zhuta	Service Center Manager	Yes	Yes
Alaska Marine Trucking	Andrew Heuscher	Director of Regulatory Compliance & Claims	Yes	Yes
Alaska Marine Trucking	Jeffrey Barney	HSSE Manager	Yes	Yes

Facility Information

Responsible official?	Jeffrey Barnes, HSSE Manager
Type of Operation	The facility is a freight moving company. The facility receives incoming freight from barges. Outgoing freight is received from customers, prepared for shipping, and shipped out on barges.
Industrial Sector?	The facility is in Sector P (Land Transportation and Warehousing). Sector P does not require any pollutant monitoring.
Is property owned or leased?	The site is owned by Alaska Marine Trucking.
Size of Facility	The facility site is approximately three acres.
Years in operation?	The business has been in operation for approximately 52 years under AMT.
Number of employees?	The facility maintains approximately 19 year-round employees.
Days and hours of operation?	The warehouse operates Monday through Friday from 8am until 5pm. Shifts and number of personnel working are adjusted when barges come in for off-loading.
Personnel conducting inspections/sampling?	Mr. Zhuta conducts the sampling for Quarterly Visual Inspections (QVIs) and prepares the Discharge Monitoring Reports (DMRs).
Receiving Water?	The facility discharges into Tongass Narrows.
Industrial activities exposed to stormwater?	Heavy equipment, i.e., forklifts, is exposed to stormwater as it loads and unloads barges. Forklifts are stored outside when not in operation. The facility does conduct vehicle maintenance on-site, but it is performed on a concrete pad in a bay.
Number/location Outfalls?	The facility has two outfalls. Outfall 1 is located near the southwest corner of the yard. The stormwater that is discharged through Outfall 1 passes through an oil/water separator prior to discharging off-site. Outfall 2 is located near the southeast corner of the yard.

Sampling locations?	Discharges are sampled at the outfalls.
BMPs/Stormwater Treatment?	The facility uses catch basins with cloth filters to treat stormwater. The catch basins are also surrounded by booms to slow water flow and filter out sediment. Water that enters the catch basins flow directly to one of the outfalls. An oil/water separator receives drainage from the shop rooftop. The o/w separator also receives water from a floor drain in the shop, but the shop drain is not exposed to stormwater. The facility uses berms to direct stormwater to the catch basins.

SECTION II – Observations

During the site tour, I did not observe anything that would constitute an area of concern.

SECTION III – Records Review

Records may not be in sequential order.

Record: Other - Quarterly Visual Inspections (QVIs)		AOC: No
Ref #: RA1-RR-008	Reviewed By: Raymond Andrews	Reviewed Date: 06/07/2024
At the time of the inspection, I reviewed the facility's QVIs covering 1Q 2021 through 1Q 2024. I did not note any areas of concern.		
Record: Other - Routine Inspection Reports		AOC: No
Ref #: RA1-RR-007	Reviewed By: Raymond Andrews	Reviewed Date: 06/07/2024
At the time of the inspection, I reviewed the facility's Routine Inspection Reports covering the January 2021 through May 2024. I did not note any areas of concern.		
Record: Other - EPA's Integrated Compliance Information System (ICIS) Database		AOC: Yes
Ref #: RA1-RR-006	Reviewed By: Raymond Andrews	Reviewed Date: 06/07/2024
At the time inspection, I reviewed a report from EPA's ICIS database covering the period from June 2019 through May 2024. The report indicated the facility submitted its 2020 through 2022 Annual Report late.		
Record: Other - APDES Inspection Report		AOC: No
Ref #: RA1-RR-005	Reviewed By: Raymond Andrews	Reviewed Date: 06/07/2024
At the time of the inspection, I reviewed an inspection report for an inspection conducted by the Alaska Department of Environmental Conservation (ADEC) on September 29, 2020. The only Area of Concern listed by ADEC was the SWPPP had a previous permit number. ADEC told the facility it should update the SWPPP to show the current permit number. The SWPPP I reviewed for this inspection had the correct permit number. I did not note any areas of concern.		
Record: Other - Notice of Intent (NOI) to Discharge and the ADEC Authorization to Discharge Letter		AOC: No
Ref #: RA1-RR-004	Reviewed By: Raymond Andrews	Reviewed Date: 06/07/2024
At the time of the inspection, I reviewed the facility's Notice of Intent (NOI) to Discharge and the ADEC Authorization to Discharge Letter. The NOI was dated July 24, 2020. The Authorization Letter approved the facility's request to discharge with an effective date of August 17, 2020.		

Record: Other - Audit Letter		AOC: No
Ref #: RA1-RR-003	Reviewed By: Raymond Andrews	Reviewed Date: 06/07/2024
At the time of the inspection, I reviewed an audit letter from Restoration Science & Engineering, LLC (RSE). AMT called in RSE to perform a SWPPP audit. RSE audited the SWPPP in May 2024, and found inconsistencies between the original SWPPP, dated July 2020, and conditions on the ground.		
Record: Other - Stormwater Pollution Prevention Plan (SWPPP)		AOC: Yes
Ref #: RA1-RR-002	Reviewed By: Raymond Andrews	Reviewed Date: 06/07/2024
At the time of the inspection, I reviewed the facility's SWPPP. The SWPPP had a preparation date of July 2020 with a "SWPPP Revision Date DRAFT" of June 2024. The revised SWPPP draft was in response to the audit conducted by RSE the previous month. The SWPPP was certified by the company President, Mark Reid, on June 6, 2024. The revised SWPPP addressed most of the issues discovered by RSE during its audit; however, the facility SWPPP map was incomplete. The map was missing, the size of the property in acres, locations of all existing structural controls (i.e., berms), and locations of all stormwater monitoring points.		
Record: Other - Signature Delegation		AOC: No
Ref #: RA1-RR-001	Reviewed By: Raymond Andrews	Reviewed Date: 06/07/2024
At the time of inspection, I reviewed the facility's "Designation of Signature Authority", dated April 26, 2024. Signature authority was delegated from Mark Reid, President, to Ilir Zhuta, Service Center Manager, and Jeffrey Barney, Health, Safety, Security, and Environmental Manager (HSSE).		

SECTION IV – Sampling Activity

No sampling was conducted.

SECTION V – Areas of Concern

Areas of concern may not be in sequential order.

The presentation of areas of concern does not constitute a formal compliance determination or violation.

AOC Reference #: RA1-RR-002	Records Review: Other - Stormwater Pollution Prevention Plan (SWPPP)													
Permit Requirement Part 5.2.3.3 of the permit states, in part, the SWPPP should "Provide a map showing...the size of the property in acres...locations of all existing structural control measures...locations of all storm water monitoring points..."														
AOC: The facility SWPPP map was incomplete. The map was missing, the size of the property in acres, locations of all existing structural controls (i.e., berms), and locations of all stormwater monitoring points.														
AOC Reference #: RA1-RR-006	Records Review: Other - EPA's Integrated Compliance Information System (ICIS) Database													
Permit Requirement Part 9.1 of the permit states, in part, “All monitoring data collected pursuant to Parts 7.2 must be submitted to DEC...no later than the 15th day of the following month after the permittee has received the complete laboratory results for all monitored outfalls for the reporting period.														
AOC: The facility submitted its 2020 - 2022 Annual Reports late, as seen in the table below.														
<table><tr><th>Annual Report Year</th><th>Annual Report Due</th><th>Annual Report Received</th></tr><tr><td>2020</td><td>February 15, 2021</td><td>April 06, 2023</td></tr><tr><td>2021</td><td>February 15, 2022</td><td>April 06, 2023</td></tr><tr><td>2022</td><td>February 15, 2023</td><td>January 03, 2024</td></tr></table>			Annual Report Year	Annual Report Due	Annual Report Received	2020	February 15, 2021	April 06, 2023	2021	February 15, 2022	April 06, 2023	2022	February 15, 2023	January 03, 2024
Annual Report Year	Annual Report Due	Annual Report Received												
2020	February 15, 2021	April 06, 2023												
2021	February 15, 2022	April 06, 2023												
2022	February 15, 2023	January 03, 2024												

SECTION VI – Closing Conference

I held a closing conference with facility personnel at 02:30 PM (PT) on 06/07/2024 for the inspection. During the closing conference, I discussed the observations and Areas of Concern I identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

SECTION VII – List of Appendices

1. Photo Log

APPENDIX 1: Photo Log

All photos were taken by Lead EPA Inspector, Ray Andrews, during the inspection.

Photos were not manipulated beyond minor cropping for sizing and labels or callouts to draw attention to the subject of the photo.

All photos taken during the inspection are included in the Photo Log; however, only photos that support an Observation or Area of Concern are included in the inspection report.

- P1010971 – SWPPP Cover Page
- P1010972 – SWPPP, page 2
- P1010973 – South Outfall
- P1010974 – Protected Catch Basin
- P1010975 – Protected North Catch Basin