



NPDES Compliance Inspection Report

A&K Railroad Materials, Inc.

Tacoma, WA

NPDES Tracking # WAU000661

Inspection Date: February 16, 2021

Prepared by:

Rachel Stephenson

U.S. Environmental Protection Agency, Region 10

Enforcement and Compliance Assurance Division

Water Enforcement and Field Branch

Field, Data, and Drinking Water Enforcement Section

Inspector Signature/Date:

RACHEL STEPHENSON

Digitally signed by RACHEL STEPHENSON
Date: 2021.03.12 10:49:41 -08'00'

Supervisor Signature/Date:

PETER CONTRERAS

Digitally signed by PETER CONTRERAS
Date: 2021.03.18 08:44:08 -07'00'

Table of Contents

- I. Facility Information
- II. Inspection Information
- III. Permit Information
- IV. Inspection Chronology
- V. Background and Activity
- VI. Facility Review
- VII. Areas of Concern
- VIII. Closing Conference

Attachments

- A. Aerial Map
- B. Photo Log

[Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Hall and Ms. Cunningham-Gill; or from observations during the inspection.]

I. Facility Information

Facility Name:	A&K Railroad Materials, Inc.
Facility Owner/Operator:	A&K Railroad Materials, Inc.
Facility Contacts:	Mark Hall Yard Foreman Phone: (253) 926-0408 mhall@akrailroad.com Ann Cunningham-Gill Office Manager Phone: (253) 926-0408 acunning@akrailroad.com
Facility Location:	4816 River Road East Tacoma, WA 98443
Lat/Long:	+47.2228732°, -122.3641834°
Mailing Address:	4816 River Road East Tacoma, WA 98443
NPDES Permit Number:	Unpermitted (NPDES Tracking #: WAU000661)

II. Inspection Information

Inspection Date:	February 16, 2021
Inspector:	Rachel Stephenson, Inspector EPA/R10/ ECAD/WEFB/FDDWES (206) 553-6366
Arrival Time:	12:30 PM
Departure Time:	1:30 PM
Weather Condition:	Overcast; Light Rain
Purpose:	This inspection was conducted to document the facility's compliance with the Clean Water Act.

III. Permit Information

The facility did not have a permit to discharge stormwater associated with industrial activity at the time of inspection.

IV. Inspection Chronology

This was an announced inspection. A few days before the inspection, I spoke with a facility representative over the phone. We discussed the logistics of the inspection and agreed upon a start time of 12:30 PM.

For this inspection, I operated as the lead inspector. I arrived at A&K Railroad Materials, Inc. (A&K Railroad) at 12:30 PM on February 16, 2021. Mark Hall met with me in the office parking lot. At this time, I identified myself as an EPA inspector and presented my credentials to him. We also exchanged business cards. I informed him that the purpose of the visit was to conduct a compliance inspection under the Clean Water Act (CWA). I was not denied access to the facility.

I conducted the opening conference with Mr. Hall in the office parking lot. The opening conference involved a discussion of the purpose and expectations of the inspection.

Following the opening conference, a facility walk-through took place. I concluded the inspection with a closing conference to discuss observations and notes taken throughout the course of the inspection. I was accompanied throughout the inspection by Mr. Hall; Ann Cunningham-Gill joined us in the site office for the closing conference. I concluded the inspection at 1:30 PM.

V. Background and Activity

A&K Railroad was established in 1992 and operates as a railroad materials storage and supply facility.

Typically, only 2-3 employees work on-site. Mark Hall serves as the yard foreman and oversees daily operation at the facility. Ann Cunningham-Gill has been with the company since its establishment 30 years ago and currently serves as the office manager.

VI. Facility Review

A&K Railroad is located in southeast Tacoma, within the Puyallup Reservation, adjacent to the Puyallup River. See **Attachment A**, Aerial Map. The facility is entirely unpaved and 90% uncovered (exposed to stormwater).

A&K Railroad operates as a railroad materials repair, storage, and supply facility. The repair and maintenance shops are at the north end of the facility, along with the site office and parking area. The shops and office are the only covered areas. Railroad materials are stored throughout the remaining 2/3rds of the facility.

Stormwater generally settles in puddles throughout the facility, but there are two parallel gravel drainage ditches that run along the east and west property line. These drainage ditches route stormwater to the stormwater retention pond at the south end of the facility. This pond has a barrier wall on all sides and never discharges stormwater, according to Mr. Hall. There is a manhole access point that is used for instances of emergency overflow. This type of event has not occurred in the 20 years that Mr. Hall has been with A&K Railroad. According to Mr. Hall, the vegetation along the pond area is cleared each year, as directed by Pierce County water quality specialists. Pierce County performs water quality inspections each year at this facility.

See **Attachment A**, which is an aerial map of the facility. See **Attachment B**, which is photographic documentation of the facility as seen during the site review.

VII. Areas of Concern

A. Spill Cleanup

During my review of the facility at the time of the inspection, I noted an area where filter socks and absorbent pads were being used (**See Attachment B, Photo 19**). Mr. Hall explained that there had been an accidental spill last week involving a blown hydraulic hose. He stated that a hydraulic hose attachment had blown on one of the supply trucks on Friday (2/12/2021), causing a hydraulic fluid spill. After the spill occurred, he immediately began applying the filter socks, pads, etc. on the spill area as part of the initial cleanup process. He explained that the socks and filter pads that I observed during the inspection were part of the second round of cleanup.

I observed visible sheen in areas surrounding the spill site, which I pointed out to Mr. Hall during the inspection (**See Attachment B, Photos 20 & 21**). I mentioned that the spill needed to be cleaned up further, given the presence of these sheen patches, and that acquiring larger or more absorbent pads/booms/socks might be helpful for future spill events. Mr. Hall indicated that he had attempted to find better spill cleanup equipment, but that the supply stores/companies did not offer any larger or better options at that time.

VIII. Closing Conference

A closing conference was held with Mr. Hall and Ms. Cunningham-Gill to discuss my inspection observations. I thanked them for their time and cooperation with the inspection. I left the facility at 1:30 PM.

ATTACHMENT A

Aerial Map



ATTACHMENT B

Photograph Log

All photographs taken by Rachel Stephenson on February 16,
2021 Nikon Coolpix AW120, Serial # 32057443

Photo Log – A&K Railroad Materials, Inc.

Photo #:01 (DSCN0655)

Description: Facing west, photo of the maintenance shop and storage shed.



Photo #:02 (DSCN0656)

Description: Facing northwest, photo of the propane tank.



Photo #:03 (DSCN0657)

Description: Facing south, photo of railroad materials stored near the maintenance and storage shed.



Photo #:04 (DSCN0658)

Description: Facing south, photo of the entrance to the maintenance and storage shed.

Photo Log – A&K Railroad Materials, Inc.

Photo #:05 (DSCN0659)

Description: Facing west, photo of equipment near the maintenance and storage shed.



Photo #:06 (DSCN0660)

Description: Facing west, photo of diesel refueling station.



Photo #:07 (DSCN0661)

Description: Photo of pooled stormwater with visible oil sheen.



Photo #:08 (DSCN0662)

Description: Facing west, photo of stored railroad materials. Note the dense vegetation behind, this vegetation lines the perimeter of the facility and serves as stormwater filtration along the drainage ditches.

Photo Log – A&K Railroad Materials, Inc.

Photo #:09 (DSCN0663)

Description: Facing northeast, photo of hydrant and protective concrete blocks.



Photo #:10 (DSCN0664)

Description: Facing west, photo of railroad materials and equipment. Note the stormwater pooling.



Photo #:11 (DSCN0665)

Description: Facing southwest, photo of stored railroad materials and dense vegetation.



Photo #:12 (DSCN0666)

Description: Facing east, photo of stored railroad materials and pooling stormwater.

Photo Log – A&K Railroad Materials, Inc.

Photo #:13 (DSCN0667)

Description: Facing south, photo of stormwater pooling in the yard.



Photo #:14 (DSCN0668)

Description: Facing west, photo of railroad equipment and dense vegetation lining the perimeter.



Photo #:15 (DSCN0669)

Description: Facing south, photo of stored railroad materials and pooling stormwater.



Photo #:16 (DSCN0670)

Description: Facing east, photo of stored railroad materials and pooling stormwater.

Photo Log – A&K Railroad Materials, Inc.

Photo #:17 (DSCN0671)

Description: Facing southeast, photo of stored railroad materials and pooling stormwater.



Photo #:18 (DSCN0672)

Description: Facing south, photo of materials and dense vegetation.



Photo #:19 (DSCN0673)

Description: Facing east, photo of the hydraulic fluid spill area and associated cleanup. Note the absorbent pads and socks.



Photo #:20 (DSCN0674)

Description: Facing south, photo of the water pooled near the hydraulic fluid spill. Note the sheen present in some areas.

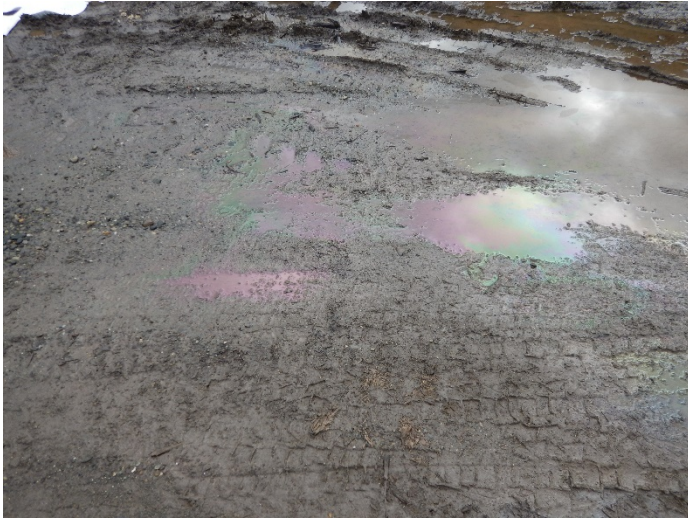
Photo Log – A&K Railroad Materials, Inc.

Photo #:21 (DSCN0675)

Description: Facing south, photo of the water pooled near the hydraulic fluid spill. Note the sheen present in some areas.



Photo #:22 (DSCN0676)

Description: Facing east, photo of water pooling near the holding pond at the rear of the facility.



Photo #:23 (DSCN0677)

Description: Facing east, photo of water pooling near the holding pond at the rear of the facility.



Photo #:24 (DSCN0678)

Description: Facing south, photo of the stormwater holding pond at the rear of the facility.

Photo Log – A&K Railroad Materials, Inc.

Photo #:25 (DSCN0679)

Description: Facing south, photo of the stormwater holding pond at the rear of the facility.



Photo #:26 (DSCN0680)

Description: Facing south, photo of the stormwater holding pond at the rear of the facility. Note the bermed edge and dense vegetation.



Photo #:27 (DSCN0681)

Description: Facing south, photo of the stormwater holding pond at the rear of the facility. Note the dense vegetation.



Photo #:28 (DSCN0682)

Description: Facing west, photo of stored railroad materials.

Photo Log – A&K Railroad Materials, Inc.



Photo #:29 (DSCN0683)

Description: Facing east, photo of pooling stormwater and stored materials.



Photo #:30 (DSCN0684)

Description: Facing northeast, photo of dumpster, stormwater pooling, and old shed.

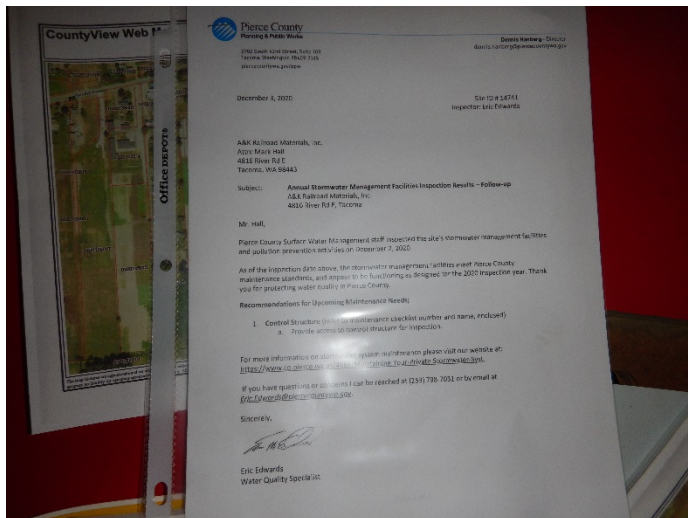


Photo #:31 (DSCN0685)

Description: Photo of the most recent Pierce County annual stormwater facilities inspection.

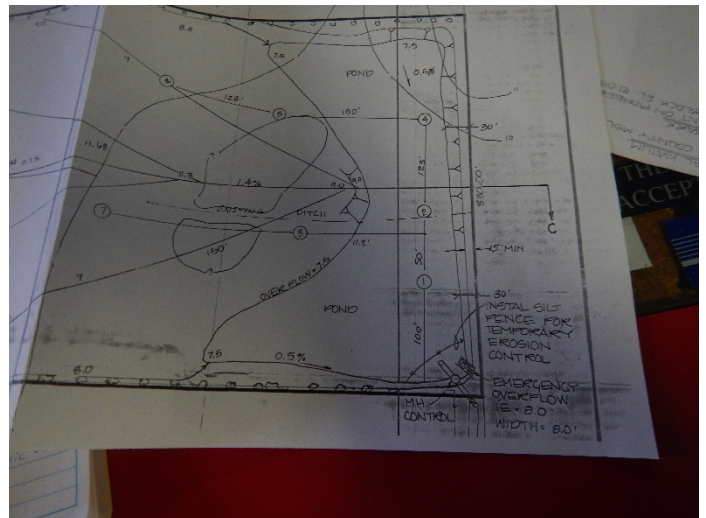


Photo #:32 (DSCN0686)

Description: Photo of original 1992 plan for the yard layout, specifically the stormwater holding pond.