



REGION 1

BOSTON, MA 02109

Date: *Dated as shown on electronic signature(s)*

Subj: Inspection Report
Clean Water Act - National Pollutant Discharge Elimination System ("NPDES")
Marina at Admirals Hill

From: Alex Rosenberg, Inspector

Thru: Damian Bednarz, Inspector

To: File

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by ALEX
ROSENBERG
Date:
2024.10.22
09:09:31 -04'00'

I. Facility Information

- A. *Facility Name:* Marina at Admirals Hill
- B. *Facility Location:* 305 Commandant's Way
Chelsea, MA 02150
- C. *Facility Contacts:* Donnie Randolph, Operator
Donnie@mybostonmarina.com
6179974772
- Rob Waters, Owner
174 Plaistow Road
Plaistow, NH 03865
603 366-5000
RWaters@WatersLegalGroup.com
- D. *NPDES ID No(s):* MAR05J07M

II. Background Information

- A. *Date(s) of inspection:* October 7, 2024
- B. *Weather Conditions:* 60 degrees, raining.
Approximately 0.5" inches of rain fell between 11:30 AM and 2:00 PM on the day of inspection according to the website Weather Underground.
- C. *US EPA Representative(s):* Alex Rosenberg
- D. *State/Local Representative(s):* N/A

E. Federally Enforceable Requirements Covered During the Inspection:

NPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (“MSGP”) (June 4, 2015 and March 1, 2021 – modified September 29, 2021)

F. Previous Enforcement Actions:

Industrial Non-Filer Expedited Settlement Agreement with Marina at Admiral’s Hill Long Term Lessees Association, Inc. Docket No.: CWA-01-2023-0061 (September 18, 2023)

III. Type and Purpose of Inspection

United States Environmental Protection Agency (“EPA”) inspectors conducted an evaluation of the facility described below that includes observations which may lead to compliance determinations under the National Pollutant Discharge Elimination System (“NPDES”) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (“MSGP” or permit).

IV. Facility Description

Marina at Admirals Hill (“Admirals Hill”), referred to hereafter as the “Facility” or the “site”, is a marina with boat slips, a marine rail, and a boat storage area. The Facility is separated into two areas, with the boat storage yard located approximately a quarter mile north of the boat lift. The two areas share the same address, 305 Commandant Way in Chelsea, Massachusetts. The entire site is approximately one acre.

V. Inspection

The inspection was announced a half an hour before arrival on-site via a phone conversation with the Facility owner Mr. Waters.

I arrived at approximately 12:00 pm and parked next to the boat lift.

A. Opening Conference

I met Donnie Randolph at the boat lift. He introduced himself as the operations manager. I presented my credentials to him and explained the purpose of the inspection. Mr. Randolph mentioned that he had taken over for the previous dock-hand, Bobby.

Mr. Randolph explained that the Facility’s clients often complain of metal dust covering their boats while moored at the Marina’s boat slips. His assumption is that the dust comes from loading activities at the Schnitzer dock across the water.

B. Facility Tour

I began the site walk by asking Mr. Randolph about the boat wash water collection system at the marine travel lift (photos 1 & 2).

Mr. Randolph explained the following:

- Shortly after EPA's last inspection in November of 2022, Mr. Waters purchased a Wash water recycling system. After payment he was told that it would be 2 years until delivery. Considering the long waiting period, Mr. Randolph built a wash water recycling system;
- The filters are changed every two or three weeks;
- The plastic mat below the washing area is changed every year;
- Roofing mastic is used to glue the plastic to the sides of the rail system; and
- Some overspray occurs, but he tries to wash it back onto the plastic.

The filters are on the shore-side of the two 250-gallon capacity plastic totes (photo 3). Mr. Randolph took a photo of the filters and showed it to me during the inspection. The photo was sent by Mr. Randolph to EPA the day after the inspection.

Mr. Randolph explained that boat washing is not conducted in any other part of the Facility.

The inspection continued into the boat storage area (that used to also be a maintenance yard).

Oil sheen was observed on the surface of stormwater runoff discharging into the centrally located catch basin (photos 4, 5, & 6). EPA inspector recommended that oil absorbing filter socks be put around the catch basin, and that other Storm Water Control Measures be implemented based on needs determined by stormwater monitoring results.

One possible source of the oil sheen is the travel lift that was parked in the area (photo 5).

Mr. Randolph was uncertain of where storm water samples were collected, or when stormwater samples have historically been collected.

Mr. Randolph indicated that maintenance of any kind is no longer permitted to be conducted in the boat storage area, as indicated by a posted sign (photo 8).

Mr. Randolph explained that he is attempting to remove all oil storage from the property but is having trouble finding a disposal facility. In the meantime, he has placed the two 55-gallon drums of waste oil on a containment pallet and has covered the pallet and drums to prevent rainwater from filling the containment capacity. In the meantime, he has placed the two 55-gallon drums of waste oil on a containment pallet and has covered the pallet and drums to prevent rainwater from filling the containment capacity. Approximately three other oil storage containers of a capacity of approximately 35 gallons are exposed to stormwater next to the containment pallet. (photo 7).

I mentioned the permit requirement (Part 1.3.5.) to post signage with information about the permit including contact phone numbers within view from a public right away.

C. Closing Conference

I told Mr. Randolph that I would send him an email for him to have my contact information. I reiterated the observations made about pollution discharging unmitigated into the catch basin within the maintenance yard.

I recommended that he send me any changes to stormwater management at the Facility as soon as they occur.

I departed at approximately 1PM.

I sent Mr. Randolph and Mr. Waters a follow-up email on October 8, 2024 requesting benchmark monitoring results per Part 4.1 of the permit and a copy of the stormwater pollution prevention plan.

On October 10, 2024, Mr. Randolph sent EPA a picture of the back (shore-side) of the wastewater tanks and a picture of oil absorbent socks placed around the catch basin in the maintenance yard.

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

Enclosure:

Photo Album

Photo Album

Location: 42.39291064, -71.04849979

Photos:



PHOTO 1

12:25:38, 2024/10/07



Photo 2

12:26:57, 2024/10/07



Photo 3

12:34:08, 2024/10/07



Photo 4

12:37:58, 2024/10/07



Photo 5

12:38:22, 2024/10/07



Photo 6

12:39:43, 2024/10/07

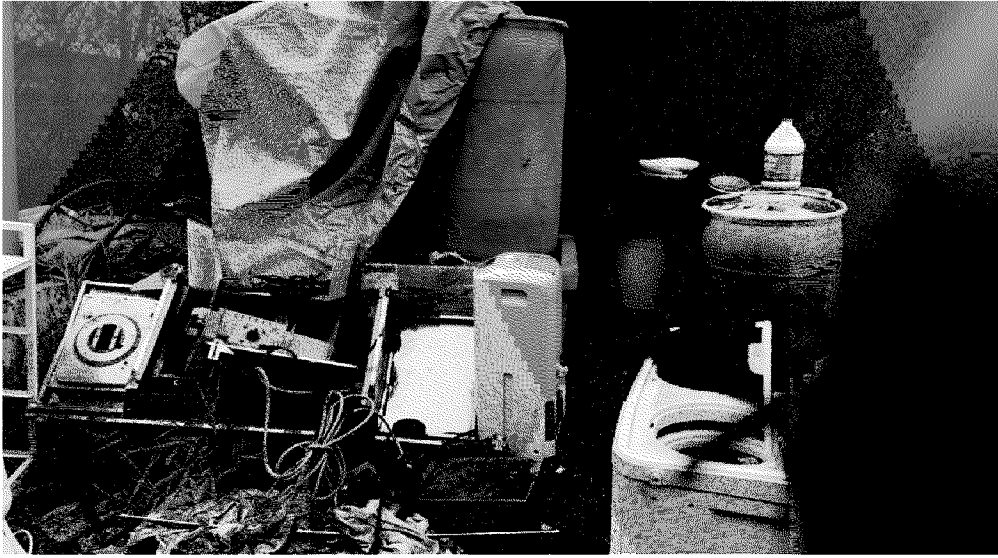


Photo 7

12:42:13, 2024/10/07



Photo 8

12:44:12, 2024/10/07