



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Four Penn Center
1600 JFK Blvd.
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date: 9/20/2023
Regulatory Program: National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Industrial Stormwater
Facility Name: Nanticoke Marina
Permittee: Nanticoke River Marine Park
Facility Owner/Operator: Blades Economic Development Corp
Operator: Nanticoke River Marine Park
Facility Address: 26 South Market Street, Blades, DE 19973
Latitude and Longitude: 38.6379 N, 75.6100 W
NPDES Permit No: Permit by Regulation
Permit ID No. DEI000333
NPDES Permit Effective Date: January 26, 2018
NPDES Permit Expiration Date: Administratively Continued

Report Preparer	_____ Chuck Schadel (3ED32)	_____ Date
Signature/Date	NPDES Section 1	
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Signature/Date	Chief, NPDES Section 1	

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- Attachment A: NPDES Storm Water General Permit
- Attachment B: Photograph Log
- Attachment C: Facility SWP (dated 12/2010)
- Attachment D: Quarterly Visual Monitoring
- Attachment E: Routine Inspections
- Attachment F: Annual Comprehensive Inspection
- Attachment G: Training Records

I. INTRODUCTION

On September 20, 2023, representatives from EPA Region 3 and a representative of the Delaware Department of Natural Resources and Environmental Control (DNREC) (hereinafter, collectively referred to as “the Inspection Team”) arrived at the Nanticoke Marina (hereinafter, “the Facility”) in Blades, Delaware. Nanticoke River Marina is identified as the Permittee and operator, but Blades Economic Development Group owns the Facility. The purpose of the inspection was to review the Permittee’s efforts to comply with the Delaware Regulations Governing the Control of Water Pollution (General Permit Program) and requires a Facility to comply with all requirements outlined within the regulations. Facility representatives were not available at the time of the inspection, therefore observations were made from the public sidewalk along the facility fence line. The Facility is a marina with a maintenance building.

A. Inspection Opening Conference

The Inspection Team arrived at the Facility at approximately 1:30 PM (EDT) for the inspection. Facility representatives were not available at the time of the inspection, therefore there was not an opening conference.

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors			
Chuck Schadel Inspector	USEPA Region 3	215 814 5761	Schadel.chuck@epa.gov
Shane McAleer, Inspector	USEPA Region 3	215-814-5616	Mcaleer.shane@epa.gov
Isaiah Mobley, Environmental Scientist II	DNREC, Resource Protection Section	302-739-9263	Isaiah.Mobley@delaware.gov

B. Weather and Precipitation

At the time of the inspection, the weather was partly cloudy skies with a maximum temperature of approximately 80 degrees Fahrenheit; no precipitation was experienced during the inspection. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the table below.

Table. 2 Precipitation Preceding Inspection¹

Station Name	Date	Precipitation Amount (inches) ²
SEAFORD 0.6 WSW, DE US US1DESS0046	9/16/2023	0.00
SEAFORD 0.6 WSW, DE US US1DESS0046	9/17/2023	0.00
SEAFORD 0.6 WSW, DE US US1DESS0046	9/18/2023	1.29
SEAFORD 0.6 WSW, DE US US1DESS0046	9/19/2023	0.01
SEAFORD 0.6 WSW, DE US US1DESS0046	9/20/2023	0.00
SEAFORD 0.6 WSW, DE US US1DESS0046	9/21/2023	0.00

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

C. Summary of the Facility

The Facility is a marina which consists of 44 boat slips and a Marine Maintenance Shop and concrete pad where the following activities take place: power washing & cleaning of hulls, mechanical repairs; waxing & buffing of hulls; vacuum sanding; bottom painting; minor fiberglass repair; and other general marine maintenance. Dispensing of fuel also takes place at the Facility.

II. OBSERVATIONS

As part of the inspection, the Inspection Team visually observed Facility conditions and documented those conditions through photographs.

The photographs (Appendix - B) for this report have been processed using EPA Region 3 's Photo Management Process. A file name (e.g., 2018-03-19--15.53.01 IMAG0032) which incorporates the date and time the photo was taken (e.g., 2018-03-19--15.53.01), as well as the original camera generated file name (e.g., IMAG0032) is assigned to each photo as part of the process. The file names generated by the camera are used to identify each photo in the Main Narrative and Photo Log of this inspection report. Unused photos are digitally stored and maintained in the inspection file. Unused photos are available upon request.

The following section summarizes the Inspection Team's observations relative to the Facility's Permit requirements.

Storm Water Plan (SWP)

The DE General Permit Regulations, Section 9.1.5.1, reads:

"Persons covered by this Subsection: ... Who engage in industrial activities identified in §9.1.1.3.1.2, excluding those facilities classified as Industrial Activity Codes HZ and LF, shall develop and continually implement a Storm Water Plan (SWP). The SWP shall identify potential sources of pollutants, which may reasonably be expected to affect the quality of storm water discharges associated with industrial activities from a facility. In addition, the SWP shall describe and ensure the implementation of practices and programs which are used to reduce or eliminate the pollutants in storm water discharges associated with industrial activity at a facility and to assure compliance with the terms and conditions of this Subsection."

The Nanticoke Marina's SWP reads:

"INDUSTRIAL MATERIAL MANAGEMENT, 6.0 F Best Management Practices

...

6.) Vessel Maintenance-Conduct vessel maintenance activities inside a building or outside on an appropriately designed impervious pad. Measures shall be taken to prevent both leaks escaping from the pad and storm water run-on to the pad.

- Spill Control materials shall be used immediately to control and clean-up any fluid spills. Abrasive blasting, sanding, and painting activities shall be performed within the vessel maintenance areas, under a tarpaulin or over a drop cloth.
- Clean regularly all accessible work, service and storage areas to remove debris, spent sandblasting material, and any other potential storm water pollutants.
- Sweep, rather than hose, debris on the pad.
- Use drip pans, drop cloths, tarpaulins. or other protective devices in all paint mixing and solvent operations unless carried out in impervious contained and covered areas. Prohibit outside spray painting, blasting, or sanding activities during windy conditions that render containment ineffective.

- Immediately clean up spillage on pad, dock, boat, or ship deck areas and dispose of wastes properly.
- Use fixed platforms with appropriate plastic or tarpaulin barriers as work surfaces and for containment when work is performed on a vessel in the water to prevent blast material or paint over spray from contacting storm or the receiving water. Use of such platforms will be kept to a minimum and at no time be used for extensive repair or construction.”

Observation 1:

According to the Facility SWP (Attachment C), a concrete pad area adjacent to the fence line along the front of the property is designated for outdoor maintenance activities. Maintenance activities include power washing & cleaning of hulls; mechanical repairs & maintenance; waxing & buffing of hulls; bottom painting; vacuum sanding and minor fiberglass repair; as well as general marine maintenance. Unloading & loading areas are located at the front & rear of the maintenance building. Figure 1 is the Map of the Facility. The Map is part of the Facility’s SWP. The highlighted area on the Map is the area identified in photos DSCN3762 through DSCN3769.

The maintenance area is highlighted on the Facility Map. The only boats (6 total) stored out of the water at the time of the inspection are identified in Photos DSCN3762 through DSCN3768 and were stored along the fence line in what appeared to be the area that is highlighted on the Facility Map. Other than the area highlighted area on the Facility Map, there were no indications of maintenance activity anywhere else at the Facility. The area surrounding the docks appeared to be concrete and was open and clearly visible from the public sidewalk that runs along the fence line of the Facility. No equipment, tools, or materials associated with industrial activity was observed to be present outside the areas highlighted on the Facility Map. No staining or sediment/debris was observed anywhere outside the maintenance area identified on the Facility Map.

Photos DSCN3763 through DSCN3768 identify what appears to be debris and/or sediment underneath the boats stored. Photo DSCN3764 and DSCN3765 appears to show tools and/or equipment under a stored boat.

Observation 2:

Photos DSCN3769 shows what appears to be the garage door to the maintenance building at the Facility. Staining, indication of spills or sediment/debris were not observed on the concrete apron adjacent to the access door for the maintenance building at the time of the inspection.

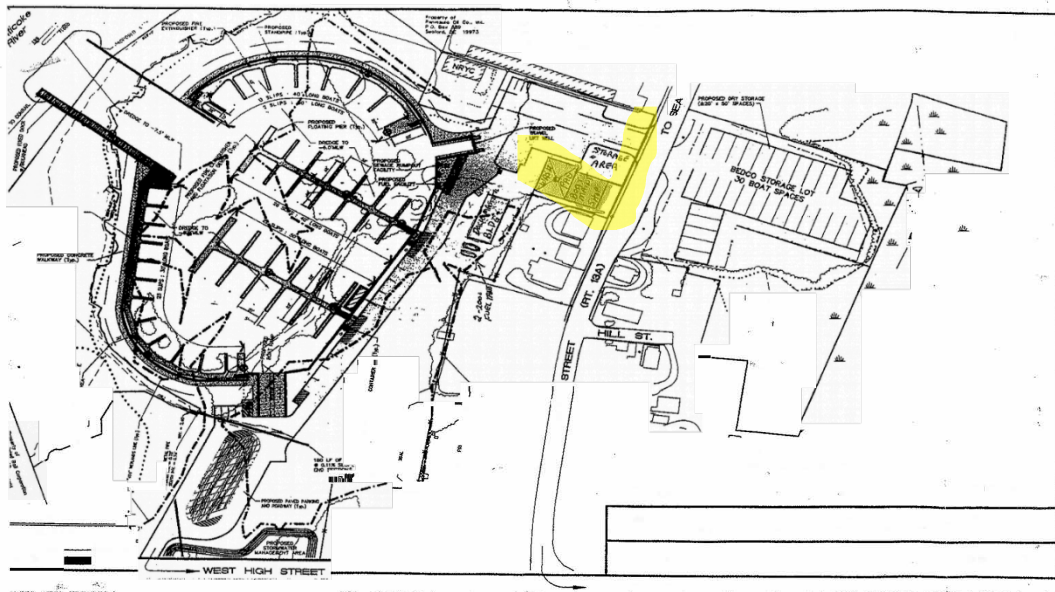


Figure 1. SWP Facility Map.

Quarterly Visual Monitoring

The DE General Permit Regulations, Section 9.1.4.3.1, reads:

“All facilities required to monitor storm water discharges, must perform and document quarterly visual examinations of storm water discharges associated with industrial activities from each storm water outfall. The examination(s) must be made at least once in each of the following three-month periods: January through March, April through June, July through September, and October through December...”

Observation 3:

The Permittee provided the documents located in Attachment D to EPA after the inspection to demonstrate their efforts to comply with this Permit requirement.

Routine Inspections

The DE General Permit Regulations, Section 9.1.5.7.4.1, reads:

“The facility shall conduct routine inspections of the equipment and areas of the facility designated in the SWP. The SWP shall identify the frequency for which these inspections are conducted. At a minimum, routine inspections shall be conducted once per quarter...”

The Nanticoke Marina’s SWP, 7.0 Routine Inspections reads:

“Routine Inspection To Be Made By Dock Master Quarterly. Any deficiencies need to corrected within 14 days.”

Observation 4:

The Permittee provided the documents located in Attachment E to EPA after the inspection to demonstrate their efforts to comply with this Permit requirement.

Comprehensive Site Evaluations

The DE General Permit Regulations, Section 9.1.5.7.4.2, reads:

“Persons subject to this Part shall conduct comprehensive site evaluations. The comprehensive site evaluations shall be used to assess the effectiveness of the current SWP... The comprehensive site evaluations shall be conducted for the frequency indicated in the table below:”

SIC Code/Industrial Activity Code	Compliance Evaluation Frequency
Sectors A, B, G, H, I, J, O, T, V, W, X, Y, Z, and AD	Annual
Sectors C, D, E, F, P, Q, R, S, U, AA, AB, and AC	Semi-annual [evaluations shall be conducted once in the fall (September-November) and once during the spring (April-June)]
Sectors M and N	Quarterly [evaluations shall be conducted at least once in each of the following three-month periods: January through March, April through June, July through September, and October through December]

Observation 5:

The Permittee provided the documents located in Attachment F to EPA after the inspection to demonstrate their efforts to comply with this Permit requirement.

Training

The DE General Permit Regulations, Section 9.1.5.7.6, reads:

“Facility employees and contractor personnel that work in areas where Industrial Materials are used or stored shall be appropriately trained to meet the requirements of the SWP. Employee training shall be conducted and documented not less than once per year. Training should address topics such as spill response, good housekeeping practices, material management practices, truck wash out procedures, equipment washdown procedures, etc.”

Observation 6:

The Permittee provided the documents located in Attachment G to EPA after the inspection to demonstrate their efforts to comply with this Permit requirement.

III. CLOSING CONFERENCE

There was no closing conference, since Facility representatives were not available on site the day of the inspection. Mr. Shane McAleer called Mr. Edward Cranston (contact for the Facility) the day the Inspection Team travelled to the Nanticoke Marina. Mr. McAleer left a message at the phone number for Nanticoke Marina. The message explained our intent to inspect the Nanticoke Marina. A return call was received by Mr. Cranston by phone on 9/25/2023. Mr. Cranston explained that the Marina is only open on Thursday through Sunday, which delayed his response to our phone message. As of the date of this inspection report, Mr. Cranston is compiling records related to NPDES compliance and will provide those records in response to this inspection report.

The inspection concluded at approximately 11:45 AM (EDT).