

## NPDES Inspection Report - Stormwater Industrial

| National Database Information                                                                                    |                                                                                              |                                    |
|------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|------------------------------------|
| Inspection Date: 3/11/2024                                                                                       | Inspection Type: Industrial Stormwater                                                       |                                    |
| Entry/Exit Time: 2:35 pm / 4:15 pm                                                                               | NPDES ID Number: UTU000043                                                                   |                                    |
| SIC Code: 4213                                                                                                   | Inspection ID: 202403_ UTU000043                                                             |                                    |
| Lead Inspector and affiliation: Stephanie Meyers / EPA Region 8                                                  |                                                                                              |                                    |
| Inspector and affiliation: Althea Wilson / EPA Region 8                                                          |                                                                                              |                                    |
| Inspector and affiliation: Jordan Bryant / Utah Division of Water Quality                                        |                                                                                              |                                    |
| Inspector and affiliation: Jason Boulton / North Salt Lake City MS4                                              |                                                                                              |                                    |
| Site/Facility Name and Location:<br>Wanship Enterprises, LLC<br>455 W 1100 N<br>North Salt Lake City, Utah 84045 |                                                                                              |                                    |
| Permit Information                                                                                               |                                                                                              |                                    |
| Is the permit on site and available? Unpermitted facility                                                        | Date Application Submitted: Unpermitted facility                                             |                                    |
| Latitude: 40.861368°N                                                                                            | Longitude: -111.921376°W                                                                     |                                    |
| Receiving Water(s): Unnamed catchment thence to the Jordan river and North Salt Lake City MS4                    | Acreage: approximately 6 acres                                                               |                                    |
| Regulatory Inspector's source of information: Facility observations                                              |                                                                                              |                                    |
| Areas Evaluated During Inspection                                                                                |                                                                                              |                                    |
| Permit                                                                                                           | Self-Monitoring Program                                                                      | <b><u>Pollution Prevention</u></b> |
| Records                                                                                                          | Compliance Schedule                                                                          | <b><u>Stormwater</u></b>           |
| <b><u>Facility Site Review</u></b>                                                                               | Laboratory                                                                                   | <b><u>No Exposure</u></b>          |
| <b><u>Effluent/Receiving Waters</u></b>                                                                          | Operations and Maintenance                                                                   | Other:                             |
| Flow Measurement                                                                                                 | Sludge Handling/Disposal                                                                     | Other:                             |
| Contact Information                                                                                              |                                                                                              |                                    |
|                                                                                                                  | Name(s)/Title                                                                                |                                    |
| Facility Contacts: Primary lead and present during inspections                                                   | Devyn Zuagg / Safety Manager / Wanship Enterprises, LLC / Primary lead during the inspection |                                    |
|                                                                                                                  | Mike Keel / Shop Manager / Wanship Enterprises, LLC / Present during the inspection          |                                    |
| Person/Company meeting definition of "Operator"                                                                  | Wanship Enterprises, LLC                                                                     |                                    |
| Authorized Official(s) (Per NOI or SWPPP)                                                                        | N/A, since there is currently no permit for this facility                                    |                                    |

## NPDES Inspection Report - Stormwater Industrial

| Report Review and Signature                                                                                                                                                                                                                                                                                 |                                                                                                            |                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|------------------|
| Drafter Name                                                                                                                                                                                                                                                                                                | Address/Phone Number                                                                                       | Date             |
| <div style="display: flex; align-items: center;"> <div style="font-size: 2em; font-weight: bold; margin-right: 10px;"> ALTHEA<br/>WILSON </div> <div> Digitally signed by<br/>ALTHEA WILSON<br/>Date: 2024.04.23<br/>14:38:05 -06'00' </div> </div> <div style="margin-top: 5px;">Althea Wilson</div>       | <b>U.S. EPA Region 8</b><br><b>1595 Wynkoop Street</b><br><b>8ECA-W-N</b><br><b>Denver, Colorado 80202</b> | <b>4/3/2024</b>  |
|                                                                                                                                                                                                                                                                                                             | <b>303-312-6026</b>                                                                                        |                  |
| Reviewer Name                                                                                                                                                                                                                                                                                               | Address/Phone Number                                                                                       | Date             |
| Stephanie Meyers                                                                                                                                                                                                                                                                                            | <b>U.S. EPA Region 8</b><br><b>1595 Wynkoop Street</b><br><b>8ECA-W-N</b><br><b>Denver, Colorado 80202</b> | <b>4/4/2024</b>  |
|                                                                                                                                                                                                                                                                                                             | <b>303-312-6938</b>                                                                                        |                  |
| Supervisor Signature/Name                                                                                                                                                                                                                                                                                   | Address/Phone Number                                                                                       | Date             |
| <div style="display: flex; align-items: center;"> <div style="font-size: 2em; font-weight: bold; margin-right: 10px;"> EMILIO<br/>LLAMOZAS </div> <div> Digitally signed by<br/>EMILIO LLAMOZAS<br/>Date: 2024.04.23<br/>07:35:04 -06'00' </div> </div> <div style="margin-top: 5px;">Emilio Llamozas</div> | <b>U.S. EPA Region 8</b><br><b>1595 Wynkoop Street</b><br><b>8ECA-W-N</b><br><b>Denver, Colorado 80202</b> | <b>4/12/2024</b> |
|                                                                                                                                                                                                                                                                                                             | <b>303-312-6407</b>                                                                                        |                  |

| Inspection Narrative and Site Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| <p>On March 11, 2024, U.S. Environmental Protection Agency (EPA) inspectors Stephanie Meyers and Althea Wilson along with Utah Division of Water Quality (DWQ) inspector Jordan Bryant, and North Salt Lake City Municipal Separate Storm Sewer System (MS4) Stormwater Enforcement Inspector Jason Boulton arrived at Wanship Enterprises, LLC (facility) at 2:35 pm to conduct an inspection and evaluate the facility's need for industrial stormwater permit coverage. The EPA, DWQ, and MS4 performed a joint inspection at this facility. The inspection was announced approximately one week prior to the inspection, to coordinate logistics for the inspection and to ensure that appropriate personnel would be available. The EPA inspectors along with DWQ and the MS4 met with Devyn Zuagg, Safety Manager and Mike Keel, Shop Manager (no longer employed by the facility) of Wanship Enterprises, LLC. EPA inspector, Stephanie Meyers, presented her credentials and had an opening conference to explain the purpose of the inspection. The inspectors began by going through a series of checklist questions with the facility representatives. Once complete, the inspectors proceeded to inspect the facility and asked questions to the facility representative to help the inspectors evaluate the need for industrial stormwater permit coverage. Throughout the inspection, the inspectors noted their observations in a checklist. Photographs taken during the inspection are included in the attached photo log.</p> <p>Wanship Enterprises, LLC is located at 455 W 1100 N in North Salt Lake City, Utah. The facility was established in 1989 and provides refrigerated less-than-truckload (LTL) second-day service to most areas in the west with the primary locations between Utah and California. A facility representative</p> |

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### Inspection Narrative and Site Description

stated that they deliver any items that are perishable and need refrigeration. Wanship Enterprises, LLC is comprised of a fleet of 73 trucks, 12 of which are electric and the other 61 operate on diesel, that drive approximately five million miles per year. Products arrive at the facility where they are loaded into the trailer beds located in the loading dock, and then shipped to their respective consumers. A facility representative stated that maintenance occurs on-site indoors, which contains a drain to capture materials from maintenance activities and flows to a sand and oil separator and then to an evaporative sump pit. There is an above ground double lined diesel storage tank with a capacity of 10,500 gallons that is pumped underground to their fueling station. Pressure washing of the inside of trailer beds occurs on a crushed asphalt and dirt pad outdoors with only water being used. The wash water flows onto the crushed asphalt pad and the surrounding lot.

After the opening conference, inspectors then walked the facility and first observed the maintenance shop with floor drains in the main bay containing some liquid (photo 1) where Wanship trucks and equipment receive maintenance. The drain inside of the maintenance shop flows to a sand and oil separator and then to an evaporative sump pit. Inspectors then observed the grease and diesel storage inside the maintenance shop (photo 2). Inspectors then proceeded to the south bay where they observed the cleaner and enzyme liquid storage (photo 3). The south bay also stores the argon and AC refrigerant (photo 4). The maintenance shop has a pit in the main bay for oil changes where oil is pumped down into it and the used oil is removed (photo 5). Near the maintenance pit, inspectors observed the used oil storage and buckets of used oil above a drain in the main bay (photo 6). There are also totes containing windshield washer fluid, engine oil, and antifreeze stored in the main bay of the maintenance shop (photo 7). Inspectors then exited the maintenance shop where they observed outdoor drum storage and antifreeze on the north side of the facility (photos 8 and 9). Next, inspectors observed a tote of rejected peanut oil and an old, uncapped fuel tank that is not use being stored outdoors (photos 10 and 11). The trailers are stored on a dirt lot along the perimeter of the facility (photo 12). There is a double-lined above ground diesel storage tank with a capacity of approximately 10,500 gallons located on the south end of the facility (photo 13). In the southeast corner of the facility, inspectors observed a covered outdoor storage are of various materials (photo 14). Inspectors then observed the outdoor wash station located on a crushed asphalt and dirt ground in the center of the facility (photo 15). Inspectors continued to walk the facility and observed the main pump for diesel fueling and wash fluid on the southwest side of the facility (photo 16). Next to the fueling pump is a wooden storage shed containing their diesel exhaust fluid (DEF) tank with ammonia and water, used to neutralize toxic emissions (photo 17).

After the inspection of the facility, the inspectors returned to the main office and held a closing conference with Devyn Zuagg and Mike Keel where they discussed observations.

### Observations, Corrective Actions, and Recommendations

Observation 1: Wanship Enterprises, LLC is an industrial facility under industrial stormwater Sector P: Motor Freight Transportation Facilities, Passenger Transportation Facilities, Petroleum Bulk Oil Stations and Terminals, Rail Transportation Facilities, and United States Postal Service Transportation Facilities, operating without industrial stormwater permit coverage.

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### Observations, Corrective Actions, and Recommendations

The facility's primary SIC code is 4213 (Trucking, Except Local), which falls under industrial stormwater Sector P: Motor Freight Transportation Facilities, Passenger Transportation Facilities, Petroleum Bulk Oil Stations and Terminals, Rail Transportation Facilities, and United States Postal Service Transportation Facilities, requiring industrial stormwater permit coverage. The facility has outdoor industrial operations/activities, including fueling (photo 16) and truck washing (photo 15), as well as outdoor storage of materials (photos 8-13). Any discharges from this facility would flow to the North Salt Lake City MS4, thence to unnamed, unclassified catchments, thence to the Jordan River.

#### ***Regulatory Information:***

In 1987, the US Congress amended the Clean Water Act to expressly include stormwater discharges from industrial activities as requiring Clean Water Act controls. In 1990, EPA issued regulations that require specific industrial activities to obtain permits in order to discharge stormwater from their facilities under 40 C.F.R. 122.26. The Division of Water Quality of the Utah Department of Environmental Quality has direction and authority to administer stormwater permitting in Utah through the Utah Water Quality Act, and its implementing regulations and permits.

In accordance with the Utah Water Quality Act, Title 19, Chapter 5, Utah Code Annotated 2004 and the Utah Pollutant Discharge Elimination System (UPDES) Regulations, UPDES discharge permit coverage is required for stormwater discharges from specific industrial activities to surface waters of the State. Facilities engaged motor freight transportation, passenger transportation, petroleum bulk oil stations and terminals, rail transportation, and United States Postal Service transportation, (Standard Industrial Classification (SIC) codes 4011, 4013, 4111-4173, 4212-4231, 4311, and 5171) as the primary industrial activity, are specifically required to obtain permit coverage, or a No-Exposure Certification, or a No-Discharge Certification, for discharges of stormwater associated with industrial activities from the facility to surface waters of the State.

A No-Exposure Certification may be obtained for facilities where all industrial materials and activities are protected by a storm-resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. A No-Discharge Certification may be obtained for facilities with a SIC code that requires coverage but do not discharge to surface water or groundwater. Due to the outdoor storage of materials, and outdoor fueling and washing, Wanship Enterprises, LLC does not currently qualify for a No-Exposure or No-Discharge Certification.

#### **Corrective Action:**

Within **30 days** of receipt of this report, submit a Notice of Intent (NOI) for the UPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (UTR000000). See the attached NOI Form. For assistance with the NOI or if you have any questions, please contact Jordan Bryant with DWQ at [jtbrant@utah.gov](mailto:jtbrant@utah.gov).

#### **Observation 2: The facility was unsure of where maintenance shop drains flow to (photo 1).**

Facility representatives were unsure where maintenance shop drains flowed to, or if they connected to the sanitary sewer system.

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### Observations, Corrective Actions, and Recommendations

**Recommendation:** Documentation was provided by Wanship Enterprises, LLC demonstrating this observation has been resolved (a camera was used to survey the connections, and everything flows to an evaporative sump pit), no further action is required.

**Observation 3:** A fuel tank no longer in use was left uncapped outdoors (photos 10 and 11).  
Inspectors observed an old fuel tank stored outdoors that was left uncapped and is no longer in use.

**Recommendation:** Documentation was provided by Wanship Enterprises, LLC demonstrating this observation has been resolved (a cap was placed on the fuel tank), no further action is required.

**Finding 4:** A tote containing rejected peanut oil was stored outdoors (photo 10).  
Inspectors observed a tote of rejected peanut oil being stored outdoors without any secondary containment.

**Recommendation:** Documentation was provided by Wanship Enterprises, LLC demonstrating this observation has been resolved (the tote was moved indoors inside the maintenance shop), no further action is required.

**Finding 5:** Empty drums were stored uncapped outdoors (photos 8 and 9).  
Inspectors observed empty drums that previously contained antifreeze and oil stored outdoors uncapped.

**Recommendation:** Documentation was provided by Wanship Enterprises, LLC demonstrating this observation has been resolved (all drums were moved indoors inside the maintenance shop), no further action is required.

**Finding 6:** Food material was observed spilled near a roll off dumpster outdoors.  
Inspectors observed food material that had been spilled near a roll off dumpster outdoors.

**Recommendation:** Documentation was provided by Wanship Enterprises, LLC demonstrating this observation has been resolved (the food material was cleaned up and disposed of), no further action is required.