United States Environmental Protection Agency

EPA REGION 10 Enforcement and Compliance Assurance Division

INSPECTION REPORT

Inspection Entry Date/Time	06/28/2024 09:00 AM (PT)	Announced: Yes
Inspection Exit Date/Time	06/28/2024 02:20 PM (PT)	Access: Granted
Weather	56°F, Overcast	
Media	Water	
Statute(s)/Program(s)	Clean Water Act, NPDES, Stormwater – Industrial	
Type of Inspection	Compliance Evaluation Inspection	
Permittee Name	Ronald Miller – City & Borough of Wrangell	
Facility or Site Name	Wrangell Marine Service Center	
Facility/Site Physical Address	525 Front Street	
City, State, Zip Code	Wrangell, Alaska 99929	
Borough	Wrangell	
Facility GPS Coordinates	56.468771, -132.380247	
Mailing Address	P.O. Box 531	
City, State, Zip Code	Wrangell, Alaska 99929	
FRS ID	110070517615	
Permit Number	AKR06AD53	
SIC	3731 (Ship Building & Repairing) 3732 (Boat Building & Repairing)	

Lead Inspector:			
RAYMOND ANDREWS	Digitally signed by RAYMOND ANDREWS Date: 2024.08.14 13:44:54 -07'00'		
Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252
Supervisor Review:			
PETER CONTRERAS	Digitally signed by PETER CONTRERAS Date: 2024.08.14 14:34:14 -07'00'		
Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – Opening Conference

Site Entry and Inspection Objectives

I arrived at the Wrangell Marine Service Center (the "Site" or "Facility"), located at 525 Front Street, Wrangell, Alaska, at 09:00 AM (PT) on 06/28/2024 for an announced inspection. I presented my credentials to Steve Miller 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 # AKR06AD53. 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
City of Wrangell	Steve Miller	Harbor Master	Yes	Yes

Site Information

Responsible official?	Steve Miller
Type of Operation?	Harbor
Size of Facility	Approximately 5 acres
Is property owned or leased?	The property is owned by the City of Wrangell.
Years in operation?	The Harbor has been in operation since approximately 2007.
Industrial Sector?	Sector R - Ship and Boat Building and Repair Yards
Number of employees?	The facility has seven employees working seven days a week from 7am until 11:30pm.
Is the SWPPP team present?	The only member of the SWPPP Team present is Mr. Miller.
Receiving Water	Zimovia Straight
Personnel conducting inspections/sampling?	Mr. James Early, Marine Service Center Team Leader, was previously the primary inspector and sample collector. Mr. Early left his position approximately a week before the inspection. Mr. Miller also conducts inspections and sampling.
Sampling locations	Sector R facilities are only required to perform Quarterly Visual Assessments (QVAs). QVAs are always done at outfalls 1 through 4. Outfall 5 is frequently underwater and cannot be sampled.
How many Stormwater Inlets and Outfalls does the site have?	The site has approximately 26 catch basins, and a total of five outfalls. Outfalls 1 through 3 are along the shoreline approximately 20 feet apart. Outfalls 2 and 3 are concealed in the shore rocks and not easily visualized.
BMPs and Stormwater Treatment?	All catch basins are fitted with filter inserts. Stormwater collected by the catch basins passes through one of several oil/water separators located around the site prior to discharge.

Industrial activities exposed to stormwater?	Boat repairs are conducted both under cover and in the open with exposure to stormwater.
Type of materials and/or vehicles stored outdoors?	Boats awaiting, or undergoing, repair are stored both on the site's asphalt or on the water.

SECTION II – Observations

No observations were made during the site tour that constitute an area of concern.

SECTION III – Records Review

Records may not be in sequential order.

Record: Other - SWPPP Maps		**AOC:** No
Ref #: RA1-RR-015	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 08/08/2024
Post inspection, I reviewed the SWPPP maps required by the permit. The General Location Map met the requirements of the permit. The Site Map was missing a few requirements which are listed in the Areas of Concern.		
Record: SWPPP		**AOC:** Yes
Ref #: RA1-RR-014	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 08/08/2024
Post-inspection, I conducted an in-depth review of the facility's updated Stormwater Pollution Prevention Plan (SWPPP), dated July 27, 2020. The SWPPP was not signed and certified as required by Appendix A, Section 1.12.5 of the permit. Several deficiencies I observed during the on-site review of the SWPPP were corrected prior to this post-inspection review of an updated SWPPP. The SWPPP has sections for "Schedules and Procedures for Monitoring", "Good Housekeeping", "Maintenance", "Spill Prevention and Response Procedures", and "Employee Training". The sections of the SWPPP for Schedules and Procedures of Monitoring, Spill Prevention & Spill Response, and Employee Training meet permit requirements; however, the sections of the SWPPP covering Good Housekeeping and Maintenance do not include a schedule of activities. There was no documentation in the SWPPP showing it has been reviewed and updated annually as required by the permit.		
Record: Other - Comprehensive Site Inspections		**AOC:** Yes
Ref #: RA1-RR-013	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 08/07/2024
At the time of the inspection, I requested Comprehensive Site Inspections from 1Q 2020 through 2Q 2024. None of the Comprehensive Site Inspection Reports were signed and certified in accordance with Appendix A, Subsection 1.12 of the permit.		
Record: Other - Quarterly Visual Assessments (QVAs)		**AOC:** Yes
Ref #: RA1-RR-012	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 08/07/2024
Post-inspection, I requested Quarterly Visual Assessments (QVAs) from 1Q 2020 through 2Q 2024, for a more thorough review. The QVAs for 2Q and 3Q 2020 were missing. None of the QVAs I reviewed had the required photo documentation attached.		

Record: Other - Routine Facility Inspections		**AOC:** Yes
Ref #: RA1-RR-011	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 08/07/2024
At the time of the inspection, I requested Routine Facility Inspections from 1Q 2020 through 2Q 2024. The facility was missing a report for 1Q 2020. The 2Q 2020 report was missing the date and time of inspection, and the inspector's name and title.		
Record: Other – Employee Training Records		**AOC:** No
Ref #: RA1-RR-010	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 08/07/2024
Post-inspection, I reviewed personnel training records for 2020 through 2023. I did not note any areas of concern.		
Record: Other - EPA's Integrated Compliance Information System (ICIS) Database		**AOC:** No
Ref #: RA1-RR-009	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/26/2024
Pre-inspection, I reviewed a deficiencies report from EPA's ICIS database covering June 2019 through May 2024. I did not note any areas of concern.		
Record: Annual Reports		**AOC:** No
Ref #: RA1-RR-008	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/28/2024
At the time of the inspection, I requested the facility's Annual Reports for 2021 through 2023. The facility produced the requested reports. I did not note any areas of concern.		
Record: Other - Routine Quarterly Inspection Reports		**AOC:** No
Ref #: RA1-RR-007	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/28/2024
At the time of the inspection, I reviewed routine quarterly inspection reports covering 2021 thought 2023. I did not note any Areas of Concern.		
Record: Other - Quarterly Visual Inspections (QVIs)		**AOC:** Yes
Ref #: RA1-RR-006	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/28/2024
At the time of the inspection, I reviewed QVIs from 2021 through 2023. None of the QVIs had the required photographic documentation.		
Record: Other - Employee Training Records		**AOC:** Yes
Ref #: RA1-RR-005	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/28/2024
At the time of the inspection, I requested to review employee training documentation for the years 2021 - 2023. The facility could not produce training records for 2023.		
Record: Other - SWPPP Site Map		**AOC:** Yes
Ref #: RA1-RR-004	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/28/2024
At the time of inspection, I reviewed the site's SWPPP map. The map was missing: the size of the property in acres, locations of all storm water monitoring points (Monitoring points are co-located with discharge points but they do not have an identifying designator), vehicle and equipment maintenance and/or cleaning areas.		

Record: SWPPP		**AOC:** Yes
Ref #: RA1-RR-003	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/28/2024
At the time of the inspection, I reviewed the facility's SWPPP, dated January 30, 2020. The cover page of the SWPPP had the incorrect SWPPP Contact. SWPPP team in the SWPPP needs to be updated. Two members listed as part of the SWPPP Team are no longer employed by the facility.		
Record: Other - ADEC Authorization to Discharge		**AOC:** No
Ref #: RA1-RR-002	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/28/2024
At the time of the inspection, I reviewed the sites authorization to discharge, dated November 9, 2020. The authorization only lists 3 outfalls.		
Record: Notice of Intent		**AOC:** No
Ref #: RA1-RR-001	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 06/28/2024
At the time of inspection, I reviewed the site's Notice of Intent (NOI) to gain coverage under the APDES MSGP, dated October 8, 2020. The NOI lists 3 outfalls, but Mr. Miller said the site has 5 outfalls. The SWPPP map also indicates there are 5 outfalls. Post inspection, Mr. Miller provided me a copy of an NOI update, dated October 23, 2020, that included the two outfalls listed in the original NOI.		

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-004	**Records Review: Other - SWPPP Site Map**
Permit Requirement Part 5.2.3.3 of the permit states, in part, "Site map. Provide a map showing...the size of the property in acre...locations of all storm water monitoring points...vehicle and equipment maintenance and/or cleaning areas..."	
AOC: The map was missing: the size of the property in acres, locations of all storm water monitoring points (Monitoring points are co-located with discharge points but they do not have an identifying designator), vehicle and equipment maintenance and/or cleaning areas.	
AOC Reference #: RA1-RR-005	**Records Review: Other - Employee Training Records**
Permit Requirement Part 4.2.9 of the permit states, in part, "A permittee must train all employees who work in areas where industrial materials or activities are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of this permit… including all members of the permittee's Pollution Prevention Team…Training shall be conducted at least annually (or more often if employee turnover is high) and documented in the SWPPP."	
AOC: At the time of the inspection, the facility could not produce training records for 2023. Post inspection, the facility sent me a copy of the training records for 2023.	

AOC Reference #: RA1-RR-011	Records Review: Other - Routine Facility Inspections

Permit Requirement
Part 6.1.1 of the permit states, in part, "Inspections must be conducted at least quarterly (i.e., once each permit quarter)..."

AOC:
The facility was missing the Routine Facility Inspection Report for 1Q 2020.

AOC Reference #: RA1-RR-011	Records Review: Other - Routine Facility Inspections

Permit Requirement
Part 6.1.2 of the permit states, in part, "A permittee must document the findings of each routine facility inspection performed and maintain this documentation onsite with the SWPPP...At a minimum, the permittees documentation of each routine facility inspection must include...The inspection date and time...The name(s) and signature(s) of the inspector(s)..."

AOC:
The 2Q 2020 report was missing the date and time of inspection, and the inspector's name and title.

AOC Reference #: RA1-RR-012	Records Review: Other - Quarterly Visual Assessments (QVAs)

Permit Requirement
Part 6.2.1 of the permit states, in part, "Once each calendar quarter for the entire permit term, the permittee must collect a storm water sample from each outfall...and conduct a visual assessment of each of these samples."

AOC:
The QVAs for 2Q and 3Q 2020 were missing.

AOC Reference #: RA1-RR-012	Records Review: Other - Quarterly Visual Assessments (QVAs)

Permit Requirement
Part 6.2.2 of the permit states, in part, "A permittee must document the results of their visual assessments and maintain this documentation onsite with the SWPPP...(a)t a minimum, the permittees documentation of the visual assessment must include...Photographs of sample and sample location..."

AOC:
None of the QVAs had the required photo documentation attached.

AOC Reference #: RA1-RR-013	Records Review: Other - Comprehensive Site Inspections

Permit Requirement
Part 6.3.2 of the permit states, in part, "At a minimum, the permittees documentation of the comprehensive site inspection must include...A statement, signed and certified in accordance with Appendix A, Subsection 1.12 of the permit."

Appendix A, Subsection 1.12.5 of the permit states, in part, "Any person signing a document under Appendix A, Part 1.12.2 or Part 1.12.3 shall certify as follows:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision…"

AOC:
None of the Comprehensive Site Inspection Reports were signed and certified in accordance with Appendix A, Subsection 1.12 of the permit.

AOC Reference #: RA1-RR-014	Records Review: SWPPP

Permit Requirement
Part 5.2.7 of the permit states, "A permittee must sign and date the SWPPP in accordance with Appendix A, Subsection 1.12, including the date of signature."

Appendix A, Section 1.12.5 of the permit states, "Any person signing a document under Appendix A, Part 1.12.2 or Part 1.12.3 shall certify as follows:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision…"

AOC:
The SWPPP was not signed and certified as required by Appendix A, Section 1.12.5 of the permit.
Part 5.2.7 of the permit states, "A permittee must sign and date the SWPPP in accordance with Appendix A, Subsection 1.12, including the date of signature."

AOC Reference #: RA1-RR-014	Records Review: SWPPP

Permit Requirement
Part 5.2.6.1 of the permit states, in part, "The following must be documented in the SWPPP...

Good Housekeeping – A schedule for regular pickup and disposal of waste materials, along with routine inspections for leaks and conditions of drums, tanks and containers...

Maintenance – Preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, to avoid situations that may result in leaks, spills, and other releases, and any back-up practices in place should a runoff event occur while a control measure is off-line. The SWPPP shall include the schedule or frequency for maintaining all control measures used to comply with the effluent limits in Part 4..."

AOC:
The SWPPP does not include schedules for Good Housekeeping activities or Maintenance.

AOC Reference #: RA1-RR-003/014	Records Review: SWPPP

Permit Requirement
Part 5.6.5 of the permit states, in part, "The SWPPP must be updated at least annually."

AOC:
The SWPPP has not been reviewed or updated annually.

SECTION VI – Closing Conference
I held a closing conference with Facility personnel at 02:20 PM (PT) on 06/28/2024 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.

- P1010996 – Boats undergoing Repairs, photo1
- P1010997 – Boats undergoing Repairs, photo2
- P1010998 – Boats undergoing Repairs, photo3
- P1010999 – Boat being Repaired under Cover
- P1020001 – Outfall 1, photo 1
- P1020002 – Outfall 1, photo 2
- P1020003 – Outfalls 2 and 3, concealed in rocks, photo 1
- P1020004 – Boat Wash
- P1020005 – Boat Wash and Catch Basin (Near ground)
- P1020006 – Outfall 4