



NPDES Compliance Inspection Report

**Delridge Arco AM PM
Seattle, Washington**

**NPDES Permit Tracking Number
WAR313285**

Inspection Date: 09/16/2024

Prepared by:

Emily Siangkam
U.S. Environmental Protection Agency, Region 10
Enforcement & Compliance Assurance Division
Surface Water Enforcement Section

Inspector Signature/Date:

EMILY SIANGKAM	Digitally signed by EMILY SIANGKAM Date: 2024.11.14 13:08:52 -08'00'
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Supervisor Signature/Date:

Marshallonis, Daniel (Dino)	Digitally signed by Marshallonis, Daniel (Dino) Date: 2024.11.18 08:58:27 -08'00'
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This inspection report is based on information supplied by conversations with Mr. Josh Smith, Ms. Mariah Murphy, Mr. Jeffrey Karambelas, or direct observations made at the time of the inspection, and records and reports maintained by the permittee and/or contractor(s). This inspection report may also include information gathered from a review of EPA, State, and/or public records.

I. Project Information

Project Name: Delridge Arco AM PM

Project Location: 7301 Delridge Way SW
Seattle, Washington 98106

Latitude/Longitude: 47.53717 N, -122.3162 W

NPDES Tracking Number: WAR313285

Project Nature: Replacement of gas station's underground storage tanks and stormwater system development.

Permittee Name: Sevan Solutions
Mr. Jared Gallien, Senior Project Manager
4883 Wanderlust Way
Gig Harbor, Washington 98332
jared.gallien@sevansolutions.com
(253) 285-1859

Subcontractor #1: Joe Hall Construction
1317 54th Avenue East
Fife, Washington 98424
(253) 922-6815

Represented on-site by: Mr. Josh Smith, Site Superintendent
josh@joehall.com
(253) 257-6730

(Responsible Person, influence specific construction operations based on desired design)

Subcontractor #2: Antea Group
18378-B Redmond Way
Redmond, Washington 98052
(206) 854-0399

(Inspector/ SWPPP Preparer - direct control of necessary stormwater control measures, identifies deficiencies and

corrective measures as needed)

Represented on-site by: Ms. Mariah Murphy, Certified Erosion and Sediment Control Lead (CESCL)
mariah.murphy@anteagroup.us
(320) 828-3425

Project Start Date: 05/28/2024

Estimated Completion Date: 10/02/2024

Total Property Size: 0.851 acres

Total Disturbed Area: 0.12 acres

Receiving water(s): Longfellow Creek

II. Inspection Information

Inspection Date: September 16, 2024

Inspector(s): Emily Siangkam, Inspector
EPA Region 10, ECAD / SWES

Other individuals present: Ms. Vanessa Oquendo, Inspector
EPA Region 10, ECAD / SWES

Mr. Luis Buen Abad, Inspector
Washington State Department of Ecology

Arrival Time: 9:15 AM

Departure Time: 1:45 PM

Weather: Cloudy/Overcast

Purpose: To evaluate compliance with the requirements of the Clean Water Act, and the National Pollutant Discharge Elimination System (NPDES) for Stormwater Discharges Associated with Construction Activity.

III. Permit Information

The Delridge Arco AM PM construction project (hereinafter referred to as the “Project”) is permitted to discharge to Longfellow Creek under the Washington State Department of Ecology’s (Ecology) Construction Stormwater General Permit (CGP). Based upon my review within Ecology’s Permitting and Reporting Information System (PARIS), the initial permit application (notice of intent) for the construction project was submitted by Mr. Randall Arnold with BP Products North America, Inc. on March 4, 2024. Mr. Griffin Williamson with BP submitted a revised NOI application on March 12, 2024, and permit coverage became effective on March 12, 2024. See **Attachment A**, Notice of Intent, and **Attachment B**, Permit Coverage Letter. On May 1, 2024, permit coverage was transferred to Sevan Solutions. See **Attachment C**, Permit Coverage Transfer. The permit is set to expire on December 31, 2025. A notice of termination form was received by Ecology on October 22, 2024. No prior EPA/Ecology inspection/enforcement activity had been previously documented.

IV. Project Background

According to the Project’s Stormwater Pollution Prevention Plan (SWPPP), Delridge Arco AM PM is a gas station project that involves the replacement and basin relocation of underground storage tanks (USTs), fueling station upgrades, and stormwater system development. Existing structures include a station building located on the south portion of the site, a dispenser canopy, six island dispensers, and two USTs in a single underground cavity north of the station building. There is also a trash enclosure located on the south side of the station, and three stormwater catch basins onsite.

The SWPPP further states that the site is primarily paved, with minimal vegetation and landscaping along the perimeter of the site. The surrounding topography is hilly, with moderate slopes to the north/northwest; site drainage is generally sheetflow north/northwest toward Longfellow Creek. Longfellow Creek is 303(d) listed and includes total maximum daily load (TMDL) limits for temperature, dissolved oxygen, E. Coli, and fecal coliform. During construction, BMPs, such as silt fencing, wattles, storm drain inlet protection, dust control, and temporary dewatering, will be implemented to minimize stormwater runoff. North of the Project is the permitted discharge location Longfellow Creek that further discharges to the Duwamish Waterway.

According to the NOI, there are contaminated soils on site and groundwater contamination located within the site boundary. However, the NOI states the project does not intend to discharge the contaminated water to the storm system and refers to a Contamination Management Plan conducted for the Project in September of 2023. According to the Contamination Management Plan, one historical release was discovered and reported in 1989, and a soil vapor extraction system operated on the site from 1989 to 1991. All known USTs were excavated and removed in 1996 and were replaced with the current UST cavity and gasoline USTs in 1998. No diesel or waste oil has been stored on the property since the excavation and permanent removal of the

historical tanks from the site in 1996. The plan further describes the petroleum contaminated soil and backfill material will be removed using an excavator. The SWPPP states these soils will be field screened and collected for quantitative chemical analysis per Ecology Site Assessment Guidance for Underground Storage Tank Systems and will be segregated and disposed offsite if contaminated. Contaminated groundwater will either be removed by vacuum truck, stored in a frac tank, or removed and pumped into 55-gallon drums. A No Further Action (NFA) was issued by Ecology in September 2001 and there are no records of open releases at the site.

V. Inspection Chronology

This was an unannounced inspection; I was joined on the inspection by fellow EPA Region 10 Inspector Ms. Vanessa Oquendo and Washington State Department of Ecology (Ecology) inspector Mr. Luis Buen Abad. At approximately 8:30AM on the day of the inspection, I called and spoke with Mr. Jared Gallien, Senior Project Manager with Sevan Solutions. Mr. Gallien is listed on the project's Notice of Intent (NOI) as the current operator/permittee. I introduced myself and discussed that I had been asked to conduct an on-site inspection at the Delridge Arco AM PM construction project to assess compliance with the project's coverage under Ecology's Construction Stormwater General Permit (CGP). I explained that the inspection was in coordination with Ecology and would include a walk-through of the construction site and a review of permit related documents. Mr. Gallien welcomed the inspection and discussed that the site is currently active with the general contractor on-site (Joe Hall Construction). Mr. Gallien explained that he would be unable to join on-site, but discussed that the site superintendent, Mr. Josh Smith of Joe Hall Construction would be on-site and available for the inspection.

Ms. Oquendo (EPA), Mr. Buen Abad (Ecology) and I arrived on-site at approximately 9:15 AM. We were greeted at the entrance by Mr. Smith, who discussed that Mr. Gallien had notified him that EPA and Ecology would be conducting an inspection at 9:30 AM.

Following our initial introductions, I presented my EPA credentials and discussed the purpose and expectations of the inspection and provided my business card. We had a brief discussion regarding the Project's general timeline and recent activities, and Mr. Smith explained that they were in the last third of the construction phase, which includes concrete pouring. Mr. Smith stated that there were delays due to soil sampling and the adding of a trench drain, but they planned to have final stabilization completed by October 2, 2024. The Project has three to five full time employees, but there are 10 to 12 employees on-site for concrete pours. Other contractors onsite include Allied Electric and Strickland and Sons Excavation Services. The Project is generally active from Monday to Friday, from 7 AM to 3:30 PM.

The Certified Erosion and Sediment Control Lead (CESCL) listed on the Notice of Intent, Mr. Jonah Leurquin, was no longer with the Project's consultant, Antea Group. Mr. Leurquin left employment a few months prior to the inspection. Mr. Smith called Mr. Jeffrey Karambelas, Antea Group's manager for the Project, who offered to answer my questions over the phone. Mr. Karambelas told us that Antea Group would have one

of their staff that conduct CESCL-related work onsite in an hour. Ms. Mariah Murphy of Antea Group arrived at the site at approximately 11:00 AM.

The inspection consisted of an opening conference, a records review, a walk-through of the construction site, and concluded with a closing conference. I also provided a copy of EPA's Small Business Resources Information Sheet. Portions of the record review also occurred post-inspection, as discussed in Section VI of this inspection report. During the closing conference we discussed our observations during the walk-through, potential compliance concerns and next steps. We were accompanied throughout the inspection by Mr. Smith and Ms. Murphy, who were present for both the opening and closing conference. Post-inspection, I followed up with an email to Mr. Karambelas and Ms. Murphy requesting electronic copies of the documents onsite. Ms. Murphy provided an electronic copy of the Stormwater Pollution Prevention Plan (SWPPP) and site maps on September 17, 2024, and Mr. Karambelas provided a response to my questions on October 31, 2024.

VI. File Review

The following documents were reviewed as part of this inspection (and may not be in sequential order):

- Stormwater Pollution Prevention Plan (SWPPP) – During the inspection, on-site representatives provided a copy of the Stormwater Pollution Prevention Plan (SWPPP) along with all the Appendices. The SWPPP, dated May 10, 2024, included several site maps, BMP details and pages from the 2019 Stormwater Management Manual for Western Washington, a site inspection form, a copy of the CGP, the Contaminated Media Management Plan, and a Phase I And II Environmental Site Assessment. The SWPPP and all its Appendices were also provided electronically after the inspection. See **Photos 22-27**.
- Site Inspections Reports – I reviewed the weekly and post-storm event site inspection reports that were required by the permit since the project start date.

Routine site inspection reports were available for 5/31/24, 6/3/24, 6/14/24, 6/18/24, 6/27/24, 7/5/24, 7/10/24, 7/19/24, 7/25/24, 8/2/24, 8/15/24, 8/19/24, and 9/4/24. The last site inspection I reviewed was conducted on September 4, 2024. During the opening conference, Ms. Murphy noted that the inspection frequency was done at a minimum of once a week, and within 24 hours of a discharge event. In general, site inspection reports were done at the correct frequency. However, the inspection reports were missing phone numbers or other reliable methods for contacting the inspector, in addition to an implementation schedule for the remedial actions the Project planned to take if the site inspection indicated the site was out of compliance. See **Photos 28-31**.

- Discharge Monitoring Reports (DMRs) – At the time of inspection, DMRs were submitted by Jared Gallien.

VII. Site Review

We first observed the area south of Sylvan Way SW, the south side of the existing convenience store/station building. Mr. Smith explained that a new trash enclosure catch basin was installed a few months prior but was not currently in operation (**Photo 1**). By the fence at the Project's property boundary, closest to Sylvan Way, I observed potable water flowing from the air/water station (**Photo 2**) and down the sloped driveway (**Photo 3**). Mr. Smith stated that the Project had issues with the local homeless population breaking through the fencing to use the water despite the Project's attempts to secure the air/water station.

The potable water flowed by gravity towards Catch Basin 1 (CB-001) and an infiltration pipe was being actively worked on by a contractor in an excavator (**Photo 4 and 6**). The excavator sat immediately in front of CB-001, which I observed had a filter insert and was partially covered by a large piece of plywood (**Photo 5**). Due to site safety concerns, I did not look directly into CB-001. I was informed that water entering CB-001 would sit in the trench drain being built until there was enough stormwater for it to flow to an unnamed Type 2 catch basin further north along the trench drain, until it eventually reached Catch Basin 3 (CB-003), which flows to Longfellow Creek. In the event of an overflow, blockage, plug, or malfunction, stormwater would be diverted from the Type 2 catch basin to the overflow detention pond facing SW Orchard Street.

We continued walking past the trench drain to what was referred to as the "forecourt" of the Project, in front of the convenience store. Mr. Smith discussed that there were two retention strips built under the gas station canopy. Due to the graded slope, the strip closest to the convenience store was intended to exclusively capture stormwater (**Photo 7**). At the time of the inspection, this strip drain was still in the process of being installed. Due the grading under the canopy itself, all oil and water under the canopy would flow to the second strip drain on the opposite side of the canopy and be treated by the newly installed oil/water separator (**Photo 8**). I was informed that the water in the oil/water separator does not commingle with stormwater; after the oily water is treated, it enters the City of Seattle's sanitary sewer system. In this area, I also observed the Project's contractors actively working on a gravel pile.

We then observed the area of fencing and curbing on the property along Delridge Way SW, parallel to the canopy. I observed that this area employed the usage of both triangular silt dikes and silt fencing (**Photos 9-12**). However, I observed several downed silt fences. Ms. Murphy explained that they had to fix the silt fencing and dikes a few times because contractors would place equipment on top of the BMPs. At the furthest end of the steel fence, closest to the Arco gas price sign, I observed that the unnamed Type 2 catch basin had a filter insert and was covered with a piece of plywood (**Photos 13-14**). I did not observe any water in the unnamed catch basin. Ms. Murphy explained that sampling was conducted from CB-003, rather than the Type 2 catch basin, as it is more representative of stormwater leaving the property and flowing to Longfellow Creek. However, CB-003 is outside the property boundaries, by the sidewalk and crosswalk along Delridge Way SW. Due to a drier summer season, the Project has not had any

discharge events since June. Post-inspection, Mr. Karambelas notified me that the unnamed catch basin was renamed to “CB-4”. See **Attachment E**.

Following the fence, we observed the detention pond under the Sherwin Williams parking lot, adjacent to the Project. It was a large, vegetated area surrounded by concrete walls and blocked off from the street via steel fencing (**Photos 15-16**). If there was runoff from the pond, it would flow to an unnamed catch basin on SW Orchard Street. The catch basin is in the street immediately next to the steel fence (outside of Project property boundaries), with no sidewalk access. I was told that due to safety concerns, the Project does not sample from that catch basin, but they can try to get a safe view from the fence. Mr. Smith noted that they also had issues with members of the local homeless population setting up camp in the detention pond, despite blocking off public access via high visibility fencing.

After viewing the detention pond, we observed the newly paved area above the UST cavity. Here, I observed an uncovered container of Yellow 77 Wire Pulling Lubricant, which Mr. Smith covered (**Photo 17**). I examined the oil/water separator, which I was told does not commingle with stormwater, but instead sends the water to the City of Seattle sanitary sewer (**Photo 18-19**). Along the area facing the Sherwin Williams building and parking lot, I observed triangular silt dikes along the steel fence. I observed that there was a gap in dikes along one part of the fence and Ms. Murphy noted that a replacement dike would be added (**Photo 20**). Outside the Project’s entryway, I observed Catch Basin 2 (CB-002), which had a filter insert. I observed leaves accumulated within the catch basin (**Photo 21**).

During the inspection, no dewatering activities, vehicle maintenance, or fueling was occurring on site. I did not observe any spill kits, but Mr. Smith explained that each vehicle had a spill kit in case there are any spills, and the Project also uses absorbent pads and Eco-Pans. No concrete was being poured at the time of inspection.

VIII. Areas of Concern

The following areas of concern were noted as part of this inspection:

A. Non-Stormwater Discharges

S1.C.3 of the CGP states, “*The SWPPP must adequately address all authorized non-stormwater discharges, except for discharges from fire-fighting activities, and must comply with Special Condition S3. At a minimum, discharges from potable water (including water line flushing), fire hydrant system flushing, and pipeline hydrostatic test water must undergo the following: dechlorination to a concentration of 0.1 parts per million (ppm) or less, and pH adjustment to within 6.5 – 8.5 standard units (su), if necessary.*”

In the area west of the convenience store, by Sylvan Way SW, we observed potable water flowing down the driveway of the property from an air/water station (**Photos 2-3**). Mr. Smith stated that the Project has had issues with homeless

individuals breaking through the Project's fence to use the air/water station as a water supply, despite the Project's efforts to secure the station.

The concern is that the SWPPP has not been modified to address the non-stormwater discharge. Additionally, there is a concern that the potable water does not meet the dechlorination concentration of 0.1 ppm or less and the pH range of 6.5 – 8.5 su, as required by the CGP.

B. Maintain a Site Log Book

S4.A of the CGP states, *"The Permittee must maintain a site log book that contains a record of the implementation of the SWPPP and other permit requirements, including the installation and maintenance of BMPs, site inspections, and stormwater monitoring."*

S4.B.4 of the CGP further states, in part, *"The Permittee must summarize the results of each inspection in an inspection report or checklist and enter the report/checklist into, or attach it to, the site log book."*

At the time of inspection, I requested to view the site log book. I was told that the Project maintains the site inspection reports and SWPPP in the same folder and binder, and the Project considers this to be the site log book. The concern is that the Project does not maintain a log book (separate from the SWPPP itself) that contains a record of implementation of the SWPPP and permit requirements such as installation/maintenance of BMPs and stormwater monitoring.

C. Site Inspections Conducted by CESCL or Inspector

S4.B.1.b of the CGP states, *"The SWPPP must identify the CESCL or inspector, who must be present on site or on-call at all times."*

The SWPPP was dated May 10, 2024. As previously stated, during the inspection, Mr. Smith told me that the Project's CESCL, Jonah Leurquin, was no longer employed by Antea Group. When Mr. Smith called Mr. Karambelas, Mr. Karambelas told me he was not the site's CESCL, but he and other staff are credentialed CESCLs who do stormwater work for the Project. Although Ms. Murphy told me that Mr. Dennis Lindelof is also a certified CESCL who conducts inspections for the site, Mr. Lindelof was not listed on the SWPPP. The concern is that the SWPPP does not accurately identify who the CESCL or inspector(s) are for the site are.

D. Complete Inspection Reports/Checklists

S4.B.4 of the CGP requires, in part, *"At a minimum, each inspection report or checklist must include: [...] k. An implementation schedule for the remedial actions that the Permittee plans to take if the site inspection indicates that the site is out of compliance. The remedial actions taken must meet the requirements of the SWPPP and the permit. [...] m. The name, title, and signature of the person conducting the site inspection, a phone number or other reliable method to reach this person"*.

I observed that the most recent inspection report (**Photos 28-29**), dated September 4, 2024, noted that action was required for Elements 4 and 11 in response to “silt dike not installed correctly on E side”. The remedial action was to “install according to SWPPP”, however, the inspection report does not indicate a completion date for fixing this BMP. The concern is that the inspection report does not include an implementation schedule for the remedial action. Additionally, the inspection report does not include a reliable method of contact for the inspector.

E. Stormwater Pollution Prevention Plan (SWPPP) Modifications

S9.B.2 of the CGP states, “*The Permittee must modify the SWPPP if, during inspections or investigations conducted by the owner/operator, or the applicable local or state regulatory authority, it is determined that the SWPPP is, or would be, ineffective in eliminating or significantly minimizing pollutants in stormwater discharges from the site. The Permittee must then:*

a. Review the SWPPP for compliance with Special Condition S9 and make appropriate revisions within 7 days of the inspection or investigation.

b. Immediately begin the process to fully implement and maintain appropriate source control and/or treatment BMPs as soon as possible, addressing the problems no later than 10 days from the inspection or investigation. If installation of necessary treatment BMPs is not feasible within 10 days, Ecology may approve additional time when an extension is requested by a Permittee within the initial 10-day response period.

c. Document BMP implementation and maintenance in the site log book. The Permittee must modify the SWPPP whenever there is a change in design, construction, operation, or maintenance at the construction site that has, or could have, a significant effect on the discharge of pollutants to waters of the State.”

Upon review of the SWPPP, I observed that the document indicated it was prepared May 10, 2024, and had not been updated since construction began on May 28, 2024 (**Photo 22**).

I observed that the June 2024 DMR indicated a turbidity sample at CB-2 had reached 164 NTUs for the week of 6/3/2024. The corrective action stated, “corrected silt fence and protected source soil from SW”. It was discussed that the silt fence was not installed correctly, and the Project later decided to replace wattles that were being used at the site with triangular silt dikes.

The July 2024 DMR states “Corrective Action: reinstalled silt fence on E side of property” for the week of 7/1/24, “Corrective Action: corrected silt fence along road” for 7/7/2024, and “Corrective Action: replace silt fence along West edge of property, remove material from on top of silt fence, cover edges of soil stockpile”

for 7/21/2024.

The concern is that none of these changes or maintenance actions are reflected in the site maps, nor are there revisions in the SWPPP narrative.

F. SWPPP – Site Map Contents and Requirements

S9.E of the CGP states, “The Permittee’s SWPPP must also include a vicinity map or general location map (for example, a USGS quadrangle map, a portion of a county or city map, or other appropriate map) with enough detail to identify the location of the construction site and receiving waters within one mile of the site.”

S9.E.3 of the CGP requires the site map in the SWPPP to include “approximate slopes, contours, and direction of stormwater flow before and after major grading activities.”

S9.E.7 of the CGP requires the site map to include “locations of all surface water bodies, including wetlands.”

The SWPPP had several maps (i.e., the land title survey, and the site and grading plan) that include a smaller “vicinity map” depicting the general location of the Project in relation to the rest of the nearby neighborhood. At the time of inspection, Ms. Murphy told me that the Project had a separate site location map; Ms. Murphy showed me an electronic version on her phone and emailed a copy to me on September 17, 2024 (see **Attachment E**). The concern is that the vicinity maps do not identify the receiving waters (i.e., Longfellow Creek) within one mile of the site.

Additionally, I observed that the site maps included within the SWPPP did not identify the direction of stormwater flow before and after major grading activities, nor did they include the locations of all surface waterbodies and wetlands. The concern is that the site map(s) do not include all elements as required by S9.E of the CGP.

On October 31, 2024, Mr. Karambelas emailed me the site location map, a pre-construction stormwater layout map (dated October 9, 2024), and a post-construction stormwater layout map (also dated October 9, 2024). See **Attachment E**.

G. Control Flow Rates – Maintain Silt Dikes

S9.D.3.a of the CGP requires the Permittee to “protect properties and waterways downstream of construction sites from erosion and the associated discharge of turbid waters due to increases in the velocity and peak volumetric flow rate of stormwater runoff from the project site, as required by local plan approval authority.”

I observed a gap in triangular silt dikes along the fence by the site entrance, where I also observed some sediment had made it past the dike and fence (**Photo 20**). The concern is that the silt dikes were not protecting the nearby property and waterway downstream from stormwater runoff from the site as required by S9.D.3.a of the

Permit.

H. Protect Drain Inlets

S9.D.7.b of the CGP states, “Clean or remove and replace inlet protection devices when sediment has filled one-third of the available storage (unless a different standard is specified by the product manufacturer).”

I observed that CB-2 was protected with a filter insert, however, the catch basin was half-filled with leaves and sediment (**Photo 21**). The concern is the catch basin was not cleaned or removed when sediment filled one-third of the available storage.

I. Maintain Best Management Practices (BMPs)

S9.D.11.a of the CGP states, “Permittees must maintain and repair all temporary and permanent erosion and sediment control BMPs as needed to assure continued performance of their intended function in accordance with BMP specifications.”

I observed that six of the silt fences facing Delridge Way SW were downed (**Photos 9-12**). As stated earlier in the report, I was told that contractors often laid equipment on the silt fences, causing them to need to be replaced or readjusted. The concern is the Project is not maintaining and repairing all temporary BMPs as needed.

J. Control Pollutants

S9.D.9.b of the CGP states, in part, “Provide cover, containment, and protection from vandalism for all chemicals, liquid products, petroleum products, and other materials that have the potential to pose a threat to human health or the environment.”

I observed an uncovered container of Yellow 77 Wire Pulling Lubricant at the area that was paved over the UST cavity. The concern is that the Project did not provide cover for the wire pulling lubricant to minimize the discharge of pollutants. Mr. Smith closed the Yellow 77 container upon noting my concern to him during the inspection (**Photo 17**).

IX. Post Inspection Activities

Post inspection, on September 17, 2024, Ms. Murphy provided a general location map, a map of the Project’s discharge locations, and an electronic copy of the SWPPP. I replied with an email inquiring upon clarification of the path of stormwater flow and the Project’s discharge locations. On September 30, 2024, I replied following up as I had not yet received a response from Antea Group. On October 31, 2024, Mr. Karambelas provided a letter in response to my email. See **Attachment E**.

X. Closing Conference

Following the file review, a closing conference was held with site representatives. We discussed my observations and areas of concern at the time of the inspection. I then thanked them for their time and cooperation with the inspection.

XI. List of Appendices

Attachment A – Notice of Intent
Attachment B – Permit Coverage Letter
Attachment C – Permit Transfer
Attachment D – Photograph Log
Attachment E – Post Inspection Correspondence

ATTACHMENT A

Notice of Intent (NOI)

Application Id: 44642**Certification
Received:**
(Ecology use)**Facility/Site Name:** ARCO ampm No. 7155**Permit Number:**
(Ecology use)**Facility Address:** 7301 Delridge Way SW
Seattle, WA 98106**Facility County:** King**Permittee Name:** Randall Arnold**Permittee Title:****Permittee Email:** randall.arnold@bp.com**Permittee Phone:** 2063101851**Permittee Address:** 30 S Wacker Dr
Chicago, IL 60606-7413**Company Name:** BP Products North
America, Inc.**Disturbed Acreage:** 0.12**Certification of Permittee**

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Griffin Williamson / BP Products North America, Inc. Retail Construction Manager

Printed Name / Company

Title



Signature of Permittee *

Date

* Federal regulations require this application is signed by one of the following:

- A. For a corporation: By a responsible corporate officer, of at least the level of vice president.
- B. For a partnership or sole proprietorship: By a general partner or the proprietor, respectively.
- C. For a municipality, state, federal, or other public facility: By either a principal executive officer or ranking elected official.

Please print, sign and mail this form to the following address:

Department of Ecology
ATTN: Water Quality Program, Construction Stormwater P.O. Box 47696
Olympia, WA 98504-7696



Notice of Intent

Construction Stormwater General Permit

NOI Version: 1

Application Type: ☒ New ☐ Renewal

Permit Number:

Application Id: 44642

I. Contact Information

Permittee		
Honorific:	First Name: Randall	Last Name: Arnold
Organization Name:	BP Products North America, Inc.	Title:
Mailing Address: 30 S Wacker Dr		
City: Chicago	State: IL	Zip Code: 60606-7413
Email: randall.arnold@bp.com		
Primary Phone: 206-310-1851	Secondary Phone:	
UBI Number:		
Site Contact		
Honorific:	First Name: Randall	Last Name: Arnold
Organization Name:	BP Products North America, Inc.	Title:
Mailing Address: 30 S Wacker Dr		
City: Chicago	State: IL	Zip Code: 60606-7413
Email: randall.arnold@bp.com		
Primary Phone: 206-310-1851	Secondary Phone:	
UBI Number:		
Site Owner		
Honorific:	First Name: Soyam	Last Name: Vahora
Organization Name:		Title:
Mailing Address: 607 SW Grady Way Ste 210		
City: Renton	State: WA	Zip Code: 98057-2977
Email: julie@aamirstations.com		
Primary Phone: 425-282-0412	Secondary Phone:	
UBI Number:		

II. Electronic Discharge Monitoring Reporting

You must submit monthly discharge monitoring reports using Ecology's Electronic Discharge Monitoring Reporting (WQWebDMR) system. To sign up for WQWebDMR, or to register a new site, go to ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits, and click on the "Construction Stormwater" link. You will find information on WQWebDMR under the "WQWebDMR and PARIS" link on the right-hand side. If you are unable to submit your DMRs electronically, you may contact Ecology to request a waiver. Ecology will generally only grant waiver requests to those permittees without internet access. Only a permittee or representative, designated in writing, may request access to or a waiver from WQWebDMR. To have the ability to use the system immediately, you must submit the Electronic Signature Agreement with your application. If you have questions on this process, contact Ecology's WQWebDMR staff at WQWebPortal@ecy.wa.gov or 360-407-7097.

III. Site Information

Site Project Name: ARCO ampm No. 7155

Street Address or Location Description: 7301 Delridge Way SW

City: Seattle

County: King

Zip Code: 98106

Latitude: 47.53717

Longitude: -122.36162

Type of Construction Activity:

- ☐ Residential
☒ Commercial
☐ Industrial
☐ Highway or Road (city, county, state)
☐ Utilities (specify):
☐ Other (specify):

Site Acreage

Total site/project size: 0.851 acres

Total disturbed area: 0.12 acres

Total area of soil disturbance for your site/project over the life of the project. Include grading, equipment staging, excavation, borrow pit, material storage areas, dump areas, haul roads, side-cast areas, off-site construction support areas, and all other soil disturbance acreage associated with the project.

Will 1,000 cubic yards or more of poured concrete or recycled concrete be used over the life of the project? ☐ Yes ☒ No

Estimated project start date: 2/21/2023

Estimated project completion date: 5/3/2023

Other Permits

None

IV. Existing Site Conditions

1. Are you aware of contaminated soils on this site? ☒ Yes ☐ No
2. Are you aware of groundwater contamination located within the site boundary? ☒ Yes ☐ No
3. If you answered yes to question 1 or 2, will any contaminated soils be disturbed or will any contaminated groundwater be discharged due to the proposed construction activity? ☒ Yes ☐ No

If yes, please provide detailed information (as known and readily available) on the nature and extent of the contamination (concentrations, locations, and depth) as well as pollution prevention and/or treatment Best Management Practices (BMPs) proposed to control the discharge of soil and/or groundwater contaminants in stormwater. This should include information that would be included in related portions of the Stormwater Pollution Prevention Plan (SWPPP) that describe how contaminated and potentially contaminated construction stormwater and dewatering water will be managed. You may attach this information separately, if needed

We do not intend to discharge the contaminated water to the storm system, also the site disturbs less than 1 AC. See Contamination Management Plan attached.

V. Stormwater Pollution Prevention Plan (SWPPP)

You must develop a SWPPP prior to starting construction. Do not submit your SWPPP with your application. If you answered yes to the questions in Part IV, please submit the information that would be included in related portions of the SWPPP that describe how contaminated and potentially contaminated construction stormwater and dewatering water will be managed.

VI. Best Management Practices (BMPs)

You must use the BMPs listed in the Stormwater Management Manual for Western Washington or the Stormwater Management Manual for Eastern Washington or other manuals approved by Ecology. Alternatively, you may use demonstrably equivalent BMPs on the basis of permit condition S9.C.4. If you intend to use a BMP at your site that is not included in these manuals, but that you believe meets the definition of a demonstrably equivalent BMP, you must notify the appropriate regional office. (See Definitions in the Construction Stormwater General Permit).*

<http://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Construction-stormwater-permit#contacts>

**Note that if you receive permit coverage without indicating the preference for a demonstrably equivalent BMP and later decide to use one, you must provide Ecology with notice of the selection of an equivalent BMP no less than 60 days before the intended use of the equivalent BMP.*

VII. Discharge/Receiving Water Information

If your project includes dewatering, you must include dewatering plans and discharge locations in your site Stormwater Pollution Prevention Plan.

Location of Discharge into Surface Waterbody

Outfall Number	Outfall Description	Surface Waterbody	Outfall Type	Latitude	Longitude
001A	Longfellow Creek	Longfellow Creek	Surface Water Body	47.539268	-122.362440

VIII. State Environmental Policy Act (SEPA)

This Notice of Intent (NOI) is incomplete and cannot be approved until the applicable SEPA requirements under Chapter 197-11 WAC are met.

Who is the SEPA lead agency on your site? City of Seattle

Has the SEPA lead agency issued a final decision on your checklist? ☒ Yes ☐ No ☐ Exempt

If No: The NOI is incomplete. Ecology will hold the application until a final SEPA decision is made or the Construction Stormwater NOI public comment period ends, whichever is later. **You must notify Ecology once the lead agency has issued a determination.**

If Yes: Type of SEPA decision issued: DNS

Date of final SEPA decision: 2/22/2024

Date when all SEPA-related comment & appeal periods ended or will end: 3/7/2024

If Exempt:

- ☐ Watershed Restoration & Fish Habitat Enhancement Exemption (RCW 43.21C.0382).
- ☐ Infill Development Exemption (RCW 43.21C.229).
- ☐ Planned Action Exemption (RCW 43.21C.031).
- ☐ Categorical Exemption. Under what section of the SEPA Rule (WAC 197-11-800) is it exempt?

Section: _____

IX. Public Notice

You must publish a public notice at least **once** a week for **two** consecutive weeks with **seven days** between publications, in at least a **single** newspaper of general circulation in the county in which the facility is located. Ecology cannot grant permit coverage sooner than the end of the 30-day public comment period, which begins on the date of the **second** public notice.

Newspaper Name	First Public Notice Date	Second Public Notice Date
Seattle - The Seattle Times	12/1/2023	12/8/2023

X. Site Map

Include the site map from your Stormwater Pollution Prevention Plan. Please do not provide large-scale site plans, copies should be on 11X17 paper or smaller.

XI. Certification of Permittees

~~"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."~~

ATTACHMENT B

Permit Coverage Letter



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

March 12, 2024

Randall Arnold
BP Products North America, Inc.
30 S Wacker Dr
Chicago, IL 60606

RE: Coverage under the Construction Stormwater General Permit

Permit number: WAR313285
Site Name: ARCO ampm 7155
Location: 7301 Delridge Way SW
Seattle County: King
Disturbed Acres: 0.12

Dear Randall Arnold:

The Washington State Department of Ecology (Ecology) received your Notice of Intent for coverage under Ecology's Construction Stormwater General Permit (CSWGP). This is your permit coverage letter. Your permit coverage is effective March 12, 2024.

Retain this letter as an official record of permit coverage for your site. You may keep your records in electronic format if you can easily access them from your construction site. You can get the CSWGP, permit forms, and other information at Ecology's [CSWGP eCoverage Packet webpage](#)¹. Contact your Permit Administrator, listed below, if you want a copy of the CSWGP mailed to you. Please read the permit and contact Ecology if you have any questions.

Electronic Discharge Monitoring Reports (WQWebDMR)

This permit requires you to submit monthly discharge monitoring reports (DMRs) for the full duration of permit coverage (from the first full month of coverage to termination). Your first sampling and reporting period will be for the month of **April 2024** and your first DMR must be submitted by **May 15, 2024**.

You must submit your DMRs electronically using Ecology's secure online system, WQWebDMR. To sign up for WQWebDMR go to Ecology's [WQWebPortal guidance webpage](#)². If you have

¹ <http://www.ecology.wa.gov/eCoverage-packet>

² <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Water-quality-permits-guidance/WQWebPortal-guidance>

questions, contact the portal staff at (360) 407-7097 (Olympia area), or (800) 633-6193/Option 3, or email WQWebPortal@ecy.wa.gov.

Appeal Process

You have a right to appeal coverage under the general permit to the Pollution Control Hearing Board (PCHB). Appeals must be filed within 30 days of the date of receipt of this letter. Any appeal is limited to the general permit's applicability or non-applicability to a specific discharger. The appeal process is governed by chapter 43.21B RCW and chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2). For more information regarding your right to appeal, please reference Ecology's Focus Sheet: [Appeal of General Permit Coverage](#)³.

Annual Permit Fees

RCW 90.48.465 requires Ecology to recover the costs of managing the permit program. Permit fees are invoiced annually until the permit is terminated. Termination conditions are described in the permit. For permit fee related questions, please contact the Water Quality Fee Unit at wqfeeunit@ecy.wa.gov or (800) 633-6193/Option 2. You can also visit [Water Quality Permit Fees Webpage](#)⁴ for more information.

Ecology Field Inspector Assistance

If you have questions regarding stormwater management at your construction site, please contact your Regional Inspector, Luis Buen Abad of Ecology's Northwest Regional Office in Shoreline at luis.buenabad@ecy.wa.gov, or (425) 256-0891.

Questions or Additional Information

Ecology is here to help. Please review our [Construction Stormwater General Permit webpage](#)⁵ for more information. If you have questions about the Construction Stormwater General Permit, please contact your Permit Administrator, Stacey Britton at stacey.britton@ecy.wa.gov or (360) 764-3727.

Sincerely,



Jeff Killelea, Manager
Permit and Technical Services Section
Water Quality Program

³ <https://apps.ecology.wa.gov/publications/summarypages/1710007.html>

⁴ <https://ecology.wa.gov/Water-Shorelines/Water-quality/Water-quality-permits/Fees>

⁵ www.ecology.wa.gov/constructionstormwaterpermit

ATTACHMENT C

Permit Coverage Transfer



Transfer of Coverage

Permit # WAR 313285

Construction Stormwater General Permit

This form transfers permit coverage for all, or a portion of a site to one or more new operators.

Type of permit transfer (check one): ☐ Partial transfer (complete the Partial Transfer acreage below) ☒ Complete transfer

Specific date that permit responsibility, coverage, and liability is transferred to new operator: 5/1/2024

*If no date is indicated Ecology will determine the date of transfer.

Please see instructions for details on type of transfer.

For PARTIAL TRANSFERS indicate the acreage remaining under your operational control:

- List **total size of project/site** remaining under your operational control following the **partial transfer**: _____ acres.
- List **total area of soil disturbance** remaining under your operational control following the **partial transfer**: _____ acres.
- Submitting this form meets the requirement to submit an updated NOI (General Permit Condition G9)

Current Operator/Permittee Information

Current Operator/Permittee Name: Randall Arnold		Company: BP Products North America, Inc.		
Business Phone: (209) 310-1851	Ext:	Mailing Address: 30 S Wacker Dr		
Cell Phone:	Fax (optional):			
Email: randall.arnold@bp.com		City: Chicago	State: IL	Zip+4: 60606-7413
Signature* (see signatory requirements in Section VIII): 		Title: CPM - Pacific NW		
		Date: 05/01/24		

New Operator/Permittee Information

(the remainder of this form applies to the **new** Operator/Permittee)

I. New Operator/Permittee (Party with operational control over plans and specifications or day-to-day operational control of activities which ensure compliance with Stormwater Pollution Prevention Plan (SWPPP) and permit conditions. Ecology will send correspondence and permit fee invoices to the permittee on record.)				
Name: Jared Gallien		Company: Sevan Solutions		
Business Phone: (253) 385-1859	Ext:	Unified Business Identifier (UBI): (UBI is a nine-digit number used to identify a business entity. Write "none" if you do not have a UBI number.)		
Cell Phone (Optional):	Fax (Optional):	E-mail: jared.gallien@sevansolutions.com		
Mailing Address: 4883 Wanderlust Way		City: Gig Harbor	State: WA	Zip + 4:
II. Property Owner (The party listed on the County Assessor's records as owner and taxpayer of the parcel[s] for which permit coverage is requested. Ecology will not send correspondence and permit fee invoices to the Property Owner. The Property Owner information will be used for emergency contact purposes.)				
Name: Soyam Vahora		Company: SOYAM DELRIDGE PROPERTY LLC		
Business Phone: (425) 282-0412	Ext:	Unified Business Identifier (UBI): 602779600 (UBI is a nine-digit number used to identify a business entity. Write "none" if you do not have a UBI number.)		
Cell Phone (Optional):	Fax (Optional):	E-mail: julie@aamirstration.com		
Mailing Address: 607 SW GRADY WAY STE 210		City: Renton	State: WA	Zip + 4: 98057-2977

III. On-Site Contact Person(s) (Typically the Certified Erosion and Sediment Control Lead or Operator/Permittee)					
Name: Jonah Leurquin			Company: Antea Group		
Business Phone:		Ext:		Mailing Address: 18378-B Redmond Way	
Cell Phone: (651) 242-4736		Fax(Optional):		City: Redmond	State: WA
Email: jonah.leurquin@anteagroup.us				Zip+4: 98052-5012	
IV. Site/Project Information					
Site or Project Name ARCO amppm No. 7155			Site Acreage Total size of your site/project (that you own/control): <u>0.851</u> acres. (Note: 1 acre = 43,560 sq. ft.)		
Street Address or Location Description (If the site lacks a street address, list its specific location. For example, Intersection of Highway 61 and 34.) 7301 Delridge Way SW			Total area of soil disturbance for your site/project over the life of the project: <u>0.12</u> acres. Include grading, equipment staging, excavation, borrow pit, material storage areas, dump areas, haul roads, side-cast areas, off-site construction support areas, and all other soil disturbance acreage associated with the project. (Note: 1 acre = 43,560 sq. ft.)		
Parcel ID#: _____ (Optional)					
Type of Construction Activity (check all that apply): ☐ Residential ☒ Commercial ☐ Industrial ☐ Highway or Road (city ,county, state) ☐ Utilities (specify): _____ ☐ Other (specify): _____					
City (or nearest city): Seattle		Zip Code: 98106		Estimated project start-up date (mm/dd/yy): 5/15/2024	
County: King				Estimated project completion date (mm/dd/yy): 7/31/2024	
Record the latitude and longitude of the <i>main entrance</i> to the site or the approximate center of site.					
Latitude: <u>47.53717</u> °N			Longitude: <u>-122.3162</u> °W		
V. Existing Site Conditions					
1. Are you aware of contaminated soils present on the site? ☒ Yes ☐ No 2. Are you aware of groundwater contamination located within the site boundary? ☒ Yes ☐ No 3. If you answered yes to questions 1 or 2, will any contaminated soils be disturbed or will any contaminated groundwater be discharged due to the proposed construction activity? ☒ Yes ☐ No ("Contaminated" and "contamination" here mean containing any hazardous substance (as defined in WAC 173-340-200) that does not occur naturally or occurs at greater than natural background levels.) If you answered yes to Question 3, please provide detailed information with the NOI (as known and readily available) on the natures and extent of the contamination (concentrations, locations, and depth), as well as pollution prevention and/or treatment Best Management Practices (BMPs) proposed to control the discharge of soil and/or groundwater contaminants in stormwater. This should include information that would be included in related portions of the Stormwater Pollution Prevention Plan (SWPPP) that describe how contaminated and potentially contaminated construction stormwater and dewatering water will be managed.					

VI. WQWebDMR (Electronic Discharge Monitoring Reporting)

You must submit monthly discharge monitoring reports using Ecology's WQWebDMR system. To sign up for WQWebDMR, or to register a new site, go to <https://www.ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Water-quality-permits-guidance/WQWebPortal-guidance>. If you are unable to submit your DMRs electronically, you may contact Ecology to request a waiver. Ecology will generally only grant waiver requests to those permittees without internet access. Only a permittee or representative, designated in writing, may request access to or a waiver from WQWebDMR. To have the ability to use the system immediately, **you must submit the Electronic Signature Agreement with your transfer of coverage form**. If you have questions on this process, contact Ecology's WQWebDMR staff at WebDMRPortal@ecy.wa.gov or 800/633-6193 or 360-407-7097 (local). Note: DMRs are optional for permitted sites under 1 acre that do not discharge to impaired waterbodies.

VII. Discharge/Receiving Water Information

Indicate whether your site's stormwater and/or dewatering water could enter surface waters, **directly and/or indirectly**:

☒ Water will discharge directly or indirectly (through a storm drain system or roadside ditch) into one or more surface waterbodies (wetlands, creeks, lakes, and all other surface waters and water courses).

If your discharge is to a storm sewer system, provide the name of the operator of the storm sewer system:

(e.g., City of Tacoma): City of Seattle

☐ Water will discharge to ground with 100% infiltration, with no potential to reach surface waters under any conditions.

If your project includes dewatering, you **must** include dewatering plans and discharge locations in your site Stormwater Pollution Prevention Plan.

Location of Outfall into Surface Waterbody

Enter the outfall identifier code, waterbody name, and latitude/longitude of the point(s) where the site has the potential to discharge into a waterbody (the outfall). Enter all locations. **See illustration of Surface Waterbody Outfall locations at the end of this form.**

- Include the names and locations of both direct and indirect discharges to surface waterbodies, even if the risk of discharge is low or limited to periods of extreme weather. **Attach a separate list if necessary.**
- Give each point a unique 1-4 digit alpha numeric code. This code will be used for identifying these points in WQWebDMR.
- Some large construction projects (for example, subdivisions, roads, or pipelines) may discharge into several waterbodies.
- If the creek or tributary is unnamed, use a format such as "unnamed tributary to Deschutes River."
- If the site discharges to a stormwater conveyance system that in turn flows to a surface waterbody, include the surface waterbody name and location.

Outfall Identifier Code. These cannot be symbols. (Maximum of 4 characters).				Surface Waterbody Name at the Outfall	Latitude Decimal Degrees	Longitude Decimal Degrees
Example: 001A				Example: Puget Sound	47.5289247° N	-122.3123550° W
0	0	1	A	Longfellow Creek	47.539268 ° N	-122.362440 ° W
					° N	° W
					° N	° W

If your site discharges to a waterbody that is on the impaired waterbodies list (e.g., 303[d] list) for turbidity, fine sediment, high pH, or phosphorus, Ecology will require additional documentation before issuing permit coverage and these sites will be subject to additional sampling and numeric effluent limits (per Permit Condition S8). Ecology will notify you if any additional sampling requirements apply. Information on impaired waterbodies is available online at: <https://www.ecology.wa.gov/Water-Shorelines/Water-quality/Water-improvement/Assessment-of-state-waters-303d>.

Before signing, please use the following checklist to ensure this form is complete:

- ☐ All spaces on this form have been completed. (Attach additional sheets if necessary)
- ☐ The transfer form has been signed by both the current permittee (see Page 1) **and** the new permittee (see Section VIII below).
- ☐ The date permit responsibility was transferred is specified. (See Page 1)
- ☐ New Operator/Permittee: Before you submit this form to Ecology, please retain a copy for your records – this will serve as proof of permit coverage until documentation arrives from Ecology.
- ☐ For partial transfers: If the original permittee no longer owns or controls any portions of the site that meet the criteria for termination, the original permittee must submit a Notice of Termination (NOT) to terminate permit coverage. See the CSWGP website for a link to the NOT form: www.ecology.wa.gov/constructionstormwaterpermit.
- ☐ For sites with contaminated soils/groundwater or a new discharger to an impaired waterbody: Any special provisions to protect water quality put in place at the time of initial coverage have been reviewed and adopted by the new permittee.

Administrative Order Docket No. _____

VIII. Certification of New Permittee

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Jared Gallien

Sevan Solutions

Senior Project Manager

Printed/Typed Name

Company (operator/permittee only)

Title

May 1, 2024

Signature of New Operator/Permittee

Date

Signature of Operator/Permittee requirements:

- A. For a corporation: By a responsible corporate officer.
- B. For a partnership or sole proprietorship: By a general partner or the proprietor, respectively.
- C. For a municipality, state, federal, or other public facility: By either a principal executive officer or ranking elected official.

Please sign and return this **ORIGINAL** document to the following address:

Department of Ecology – Construction Stormwater
PO Box 47696
Olympia, WA 98504-7696

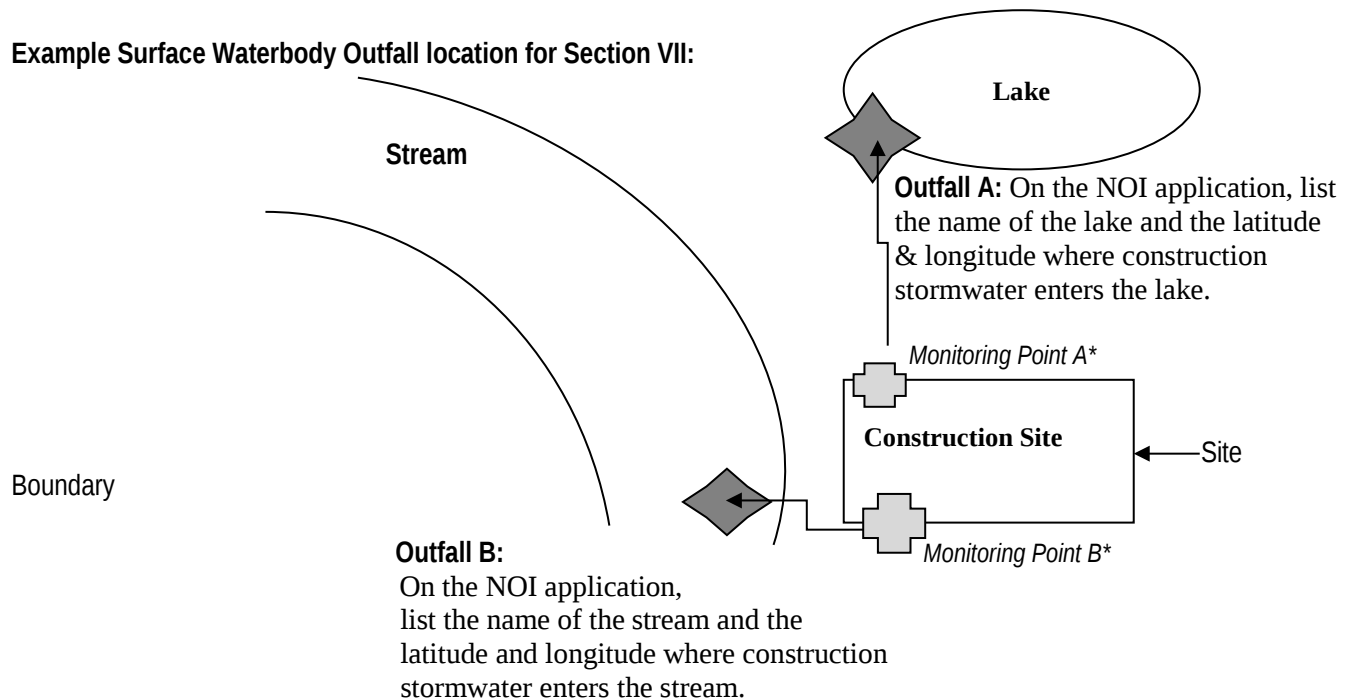
If you have questions about this form, contact the following Ecology staff:

Location	Contact Name	Phone	E-mail
City of Seattle, and Kitsap, Pierce, and Thurston counties	Josh Klimek	360-407-7451	josh.klimek@ecy.wa.gov
Island, King, and San Juan counties	RaChelle Stane	360-407-6556	rachelle.stane@ecy.wa.gov
Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Skagit, Snohomish, Spokane, Stevens, Walla, Whatcom, and Whitman counties.	Shawn Hopkins	360-407-6442	shawn.hopkins@ecy.wa.gov
Benton, Chelan, Clallam, Clark, Cowlitz, Douglas, Grays Harbor, Jefferson, Kittitas, Klickitat, Lewis, Mason, Okanogan, Pacific, Skamania, Wahkiakum, and Yakima counties.	Joyce Smith	360-407-6858	joyce.smith@ecy.wa.gov

You must submit monthly discharge monitoring reports using Ecology's WQWebDMR system. To sign up for WQWebDMR, or to register a new site, go to www.ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Water-quality-permits-guidance/WQWebPortal-guidance. If you are unable to submit your DMRs electronically, you may contact Ecology to request a waiver. Ecology will generally only grant waiver requests to those permittees without internet access. Only a permittee or representative, designated in writing, may request access to or a waiver from WQWebDMR. To have the ability to use the system immediately, **you must submit the Electronic Signature Agreement with your application.**

If you have questions on this process, contact Ecology's WQWebDMR staff at WQWebPortal@ecy.wa.gov or 800-633-6193 or 360-407-7097 (local).

Example Surface Waterbody Outfall location for Section VII:



*Note: The monitoring points are for illustration only and are not required on this Notice of Intent application form. Monitoring point information will be entered on the monthly discharge monitoring report as required for active permits.

To request ADA accommodation including materials in a format for the visually impaired, call the Water Quality Program at 360-407-6600 or visit <https://ecology.wa.gov/accessibility>. People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TYY at 877-833-6341.



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

May 13, 2024

Jared Gallien
Sevan Solutions
4883 Wanderlust Way
Gig Harbor, WA 98332

RE: Transfer of coverage under the Construction Stormwater General Permit

Permit number:	WAR313285
Site Name:	ARCO ampm 7155
Location:	7301 Delridge Way SW
	Seattle County: King
Disturbed Acres:	0.12

Dear Jared Gallien:

The Washington State Department of Ecology (Ecology) received your request to transfer permit coverage under the Construction Stormwater General Permit (CSWGP). Our records have been updated to show Sevan Solutions as responsible for permit coverage effective May 1, 2024.

Retain this letter as an official record of permit coverage for your site. You may keep your records in electronic format if you can easily access them from your construction site. You can get the CSWGP, permit forms, and other information at Ecology's [CSWGP eCoverage Packet webpage](http://www.ecology.wa.gov/eCoverage-packet)¹. Contact your Permit Administrator, listed below, if you want a copy of the CSWGP mailed to you. Please read the permit and contact Ecology if you have any questions.

¹ <http://www.ecology.wa.gov/eCoverage-packet>

Electronic Discharge Monitoring Reports (WQWebDMR)

This permit requires you to submit monthly discharge monitoring reports (DMRs) electronically using Ecology's secure online system, WQWebDMR. To sign up for WQWebDMR visit our [WQWebPortal guidance webpage](#)². If you have questions, contact the portal staff at (360) 407-7097 (Olympia area), or (800) 633-6193/option 3, or email WQWebPortal@ecy.wa.gov.

Annual Permit Fees

RCW 90.48.465 requires Ecology to recover the costs of managing the permit program. Permit fees are invoiced annually until the permit is terminated. Termination conditions are described in the permit. For permit fee related questions, please contact the Water Quality Fee Unit at wqfeeunit@ecy.wa.gov or (800) 633-6193, Option 2. You can also visit [Water Quality Permit Fees Webpage](#)³ for more information.

Ecology Field Inspector Assistance

If you have questions regarding stormwater management at your construction site, please contact your Regional Inspector, Luis Buen Abad of Ecology's Northwest Regional Office in Shoreline at luis.buenabad@ecy.wa.gov, or (425) 256-0891.

Questions or Additional Information

Ecology is here to help. Please review our [Construction Stormwater General Permit webpage](#)⁴ for more information. If you have questions about the Construction Stormwater General Permit, please contact your Permit Administrator, Stacey Britton at stacey.britton@ecy.wa.gov or (360) 764-3727.

Sincerely,



Jeff Killelea, Manager
Permit and Technical Services Section
Water Quality Program

² <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Water-quality-permits-guidance/WQWebPortal-guidance>

³ <https://ecology.wa.gov/Water-Shorelines/Water-quality/Water-quality-permits/Fees>

⁴ www.ecology.wa.gov/constructionstormwaterpermit

ATTACHMENT D

Photograph Log

All photographs taken by Emily Siangkam on September 16, 2024

Olympus Tough Camera

Photo Log - Delridge Arco AM PM



Photo #:01

Description: Newly installed catch basin on south side of convenience store that will sit under a new, locking trash enclosure.



Photo #:02

Description: Facing north, photo of air/water station on southeast corner of construction site looking across from Sylvan Way SW.



Photo #:03

Description: Facing south, photo of potable water from air/water station flowing down the Project's driveway by the



Photo #:04

Description: Facing east, toward Delridge Way SW, photo of excavator working on infiltration pipe.

existing convenience store.

Photo Log – Delridge Arco AM PM



Photo #:05

Description: Photo of Catch Basin 1 (CB-001) under excavator pictured in Photo #4, under the left tire, covered with a filter insert and a sheet of plywood.



Photo #:06

Description: Facing Delridge Way SW, further to the left from Photo #4, photo of part of trench drain being worked on by excavator.



Photo #:07

Description: Facing north, photo of the area at the edge of the gas station canopy, dug out for the retention strip closest to the convenience store, designed to flow to trench drain.



Photo #:08

Description: Facing southwest, photo of the retention strip on the other side of the gas station canopy, designed to capture oil and water for filtering through the oil/water separator.

Photo Log – Delridge Arco AM PM



Photo #:09

Description: Facing Delridge Way SW, photo of two downed silt fences by excavator (also pictured in Photo #6).



Photo #:10

Description: Facing Delridge Way SW, next to Photo #9, photo of more downed silt fences.



Photo #:11

Description: Facing north, toward the intersection of Delridge Way SW and SW Orchard Street, photo of downed silt fences, triangular silt dikes, and pile of planks.



Photo #:12

Description: Facing north, toward the intersection of Delridge Way SW and SW Orchard Street, photo of triangular silt dike made with foam and covered with fabric. I lifted the fabric to demonstrate the dike under it.

Photo Log – Delridge Arco AM PM



Photo #:13

Description: Facing the intersection of SW Orchard Street and Delridge Way SW, photo of unnamed catch basin covered with plywood, with Catch Basin 3 (CB-003) in the background, in the public right-of-way.



Photo #:14

Description: Looking south, photo of loose sediment and mud near construction entrance.



Photo #:15

Description: Photo of detention pond.



Photo #:16

Description: Facing the Sherwin Williams parking lot, photo of the detention pond.

Photo Log – Delridge Arco AM PM



Photo #:17
Description: Photo of Yellow 77 Wire Pulling Lubricant on pavement over underground storage tanks basin.



Photo #:18
Description: Photo of oil/water separator installed on 6/18/2024 (sticker on side).



Photo #:19

Description: Looking down, photo of oil/water separator.

Photo #:20

Description: Facing south, photo of Catch Basin 2 (CB-002).

Photo Log – Delridge Arco AM PM

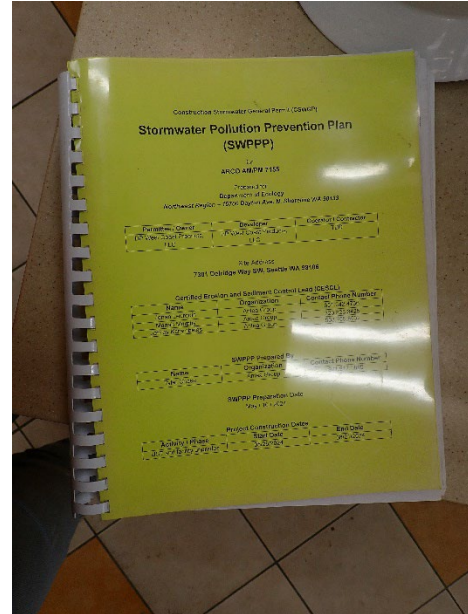


Photo #:21

Description: Facing down, CB-002 with filter insert, filled with leaves.

Photo #:22

Description: Photo of SWPPP on site, dated 5/10/2024.

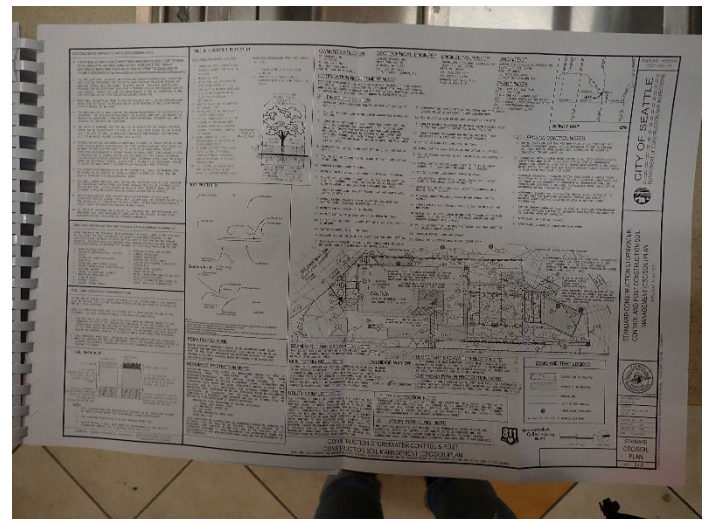
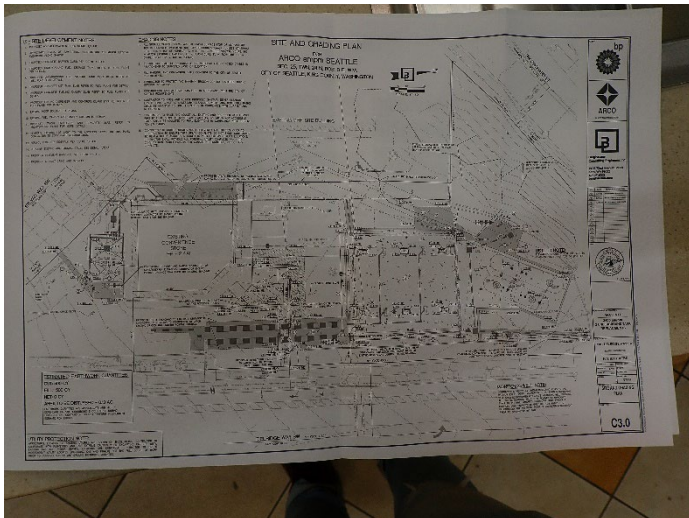


Photo #:23

Description: Photo of Site and Grading Plan included within SWPPP.

Photo #:24

Description: Photo of construction BMPs map included within SWPPP.

Photo Log – Delridge Arco AM PM

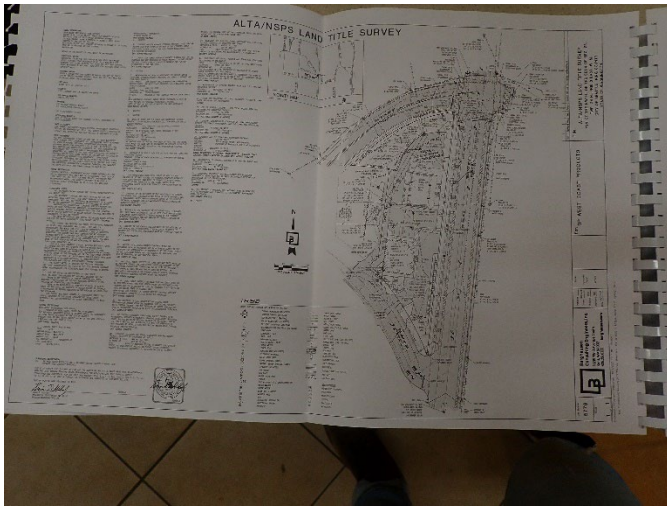


Photo #:25

Description: Photo of Land Title Survey included within SWPPP.

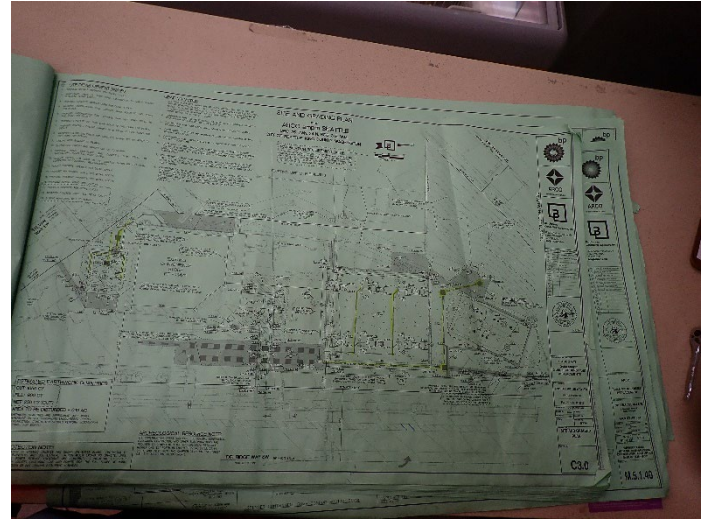


Photo #:26

Description: Photo of larger Site and Grading Plan available on site.

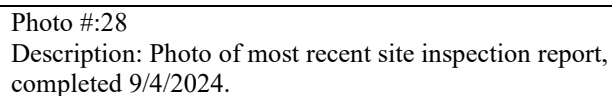
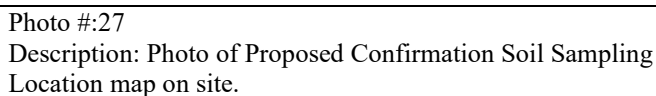
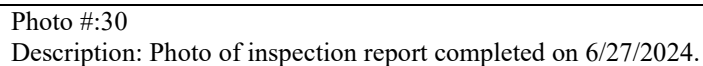
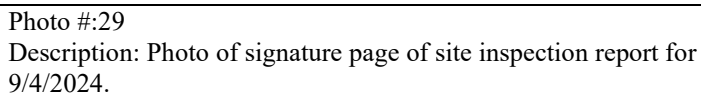


Photo Log – Delridge Arco AM PM



[illegible]

Photo #:31

Description: Photo of signature page of site inspection report for 6/27/2024.

ATTACHMENT E

Post Inspection Documentation

From: [Siangkam, Emily \(she/her/hers\)](#)
To: ["Mariah Murphy"](#)
Cc: ["Jeffrey Karambelas"](#)
Subject: RE: 7301 Delridge Way Stormwater
Date: Monday, September 30, 2024 2:39:00 PM

Hi Mariah,

Just following up from my previous email to see if you'd be able to provide a response. If you happen to have an email for Josh, too, that'd be great. Thanks in advance!

Sincerely,
Emily

Emily Siangkam

Surface Water Enforcement Section
Enforcement and Compliance Assurance Division
U.S. EPA Region 10
siangkam.emily@epa.gov | 206-553-2964
Pronouns: she/her/hers

From: Siangkam, Emily (she/her/hers)
Sent: Tuesday, September 17, 2024 2:57 PM
To: Mariah Murphy <Mariah.Murphy@anteagroup.us>
Cc: Jeffrey Karambelas <jeffrey.karambelas@anteagroup.us>
Subject: RE: 7301 Delridge Way Stormwater

Good afternoon Mariah,

Thank you for your follow-up, and thank you for your time yesterday! I received the Adobe link but I unfortunately am unable to access it. EPA uses GoAnywhere so that we/others can share large files. I sent you a GoAnywhere link – would you be able to upload the SWPPP there? If you happen to have electronic copies of the weekly inspection reports, that would also be great.

Additionally, I had a few follow-up questions; I apologize if they are repetitive from our previous conversations, but I just want to make sure that I understand what is happening at the site.

- Can you please reclarify which outfalls are which (i.e., Outfall 001-A, CB-2, CB-3, etc.)?
- Where/what are the exact locations that you are sampling from?
- Can you describe the flow path of stormwater at the site?
 - Where does stormwater go once it reaches each of those outfalls?
 - Where does stormwater from the canopy go after it enters the retention strip?
- Where does the water from the oil/water separator go? I believe we discussed that it goes to a sewer – do we know which one?
- What is the function of the new catch basin that was built under the trash enclosure?

Where does this go? Will this be monitored/sampled as well? Does this catch basin have a specific name?

I may reach out to you again as I continue developing my inspection report. Thank you so much!

Sincerely,

Emily Siangkam

Surface Water Enforcement Section
Enforcement and Compliance Assurance Division
U.S. EPA Region 10
siangkam.emily@epa.gov | 206-553-2964
Pronouns: she/her/hers

From: Mariah Murphy <Mariah.Murphy@anteagroup.us>

Sent: Tuesday, September 17, 2024 12:44 PM

To: Siangkam, Emily (she/her/hers) <Siangkam.Emily@epa.gov>

Cc: Jeffrey Karambelas <jeffrey.karambelas@anteagroup.us>

Subject: 7301 Delridge Way Stormwater

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good Afternoon Emily,

I am following up on your visit yesterday to the site at 7301 Delridge Way SW in Seattle. I have attached the documents you requested. The SWPPP is too big to attach to this email, I will work on getting a web link for that. Let me know what else you may need from me!

The project manager for this site is Jeffrey Karambelas. I have CC'd him on this email, but his information is also below:

Jeffrey Karambelas | Project Manager

Antea®Group

Toll free +1 800 477 7411 | Mobile 503 705 5532
205 SE Spokane St, Suite 307, Portland, OR 97202
Jeffrey.karambelas@anteagroup.us

Thank you,

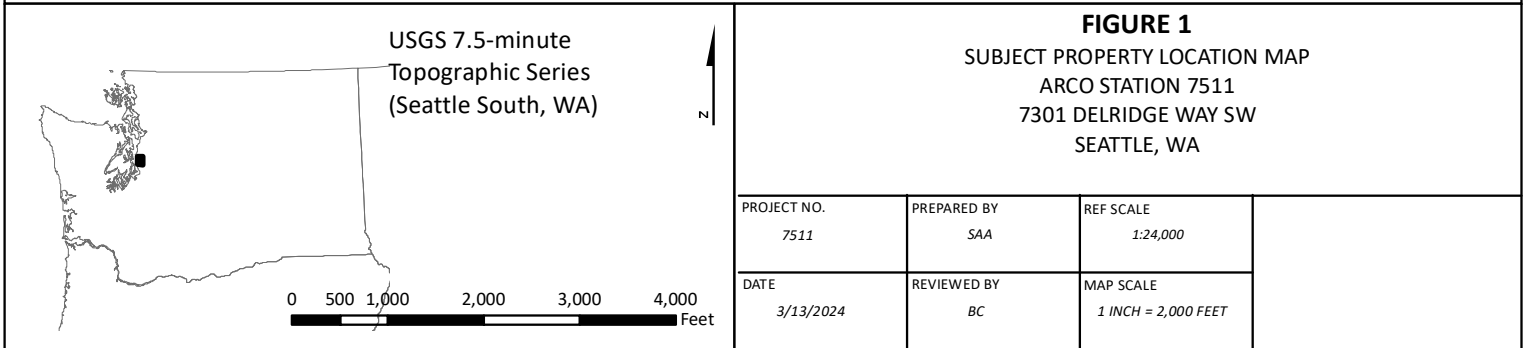
Mariah Murphy (she/her) | Staff Professional | USA Antea®Group

Mobile +1 320 828 3425 | USA Toll Free 800 477 7411
18378-B Redmond Way, Redmond, WA 98052-5012 USA
mariah.murphy@anteagroup.us | us.anteagroup.com



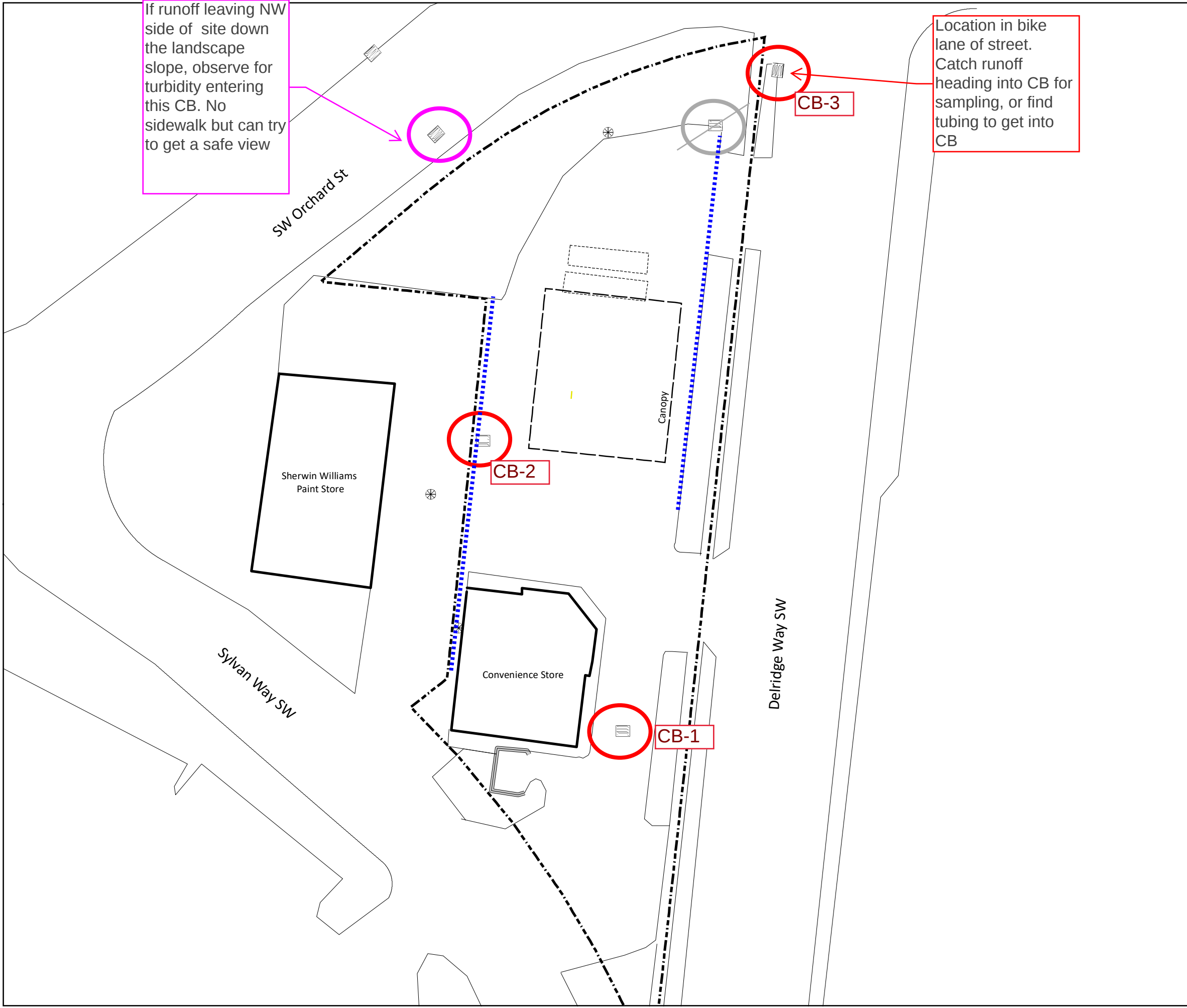
Member of Inogen®Alliance | www.inogenalliance.com

Subject
Property



If runoff leaving NW side of site down the landscape slope, observe for turbidity entering this CB. No sidewalk but can try to get a safe view

Location in bike lane of street. Catch runoff heading into CB for sampling, or find tubing to get into CB



- Legend**
- Catch Basin
 - SitePoints
 - Building
 - Canopy
 - Concrete; Planter
 - UST
 - Wall
 - Property Boundary

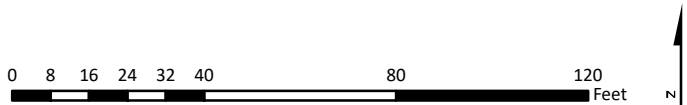


FIGURE 1
CESCL INSPECTION DISCHARGE POINTS
ARCO STATION 7511
7301 DELRIDGE WAY SW
SEATTLE, WA

PROJECT NO. 7511	PREPARED BY SAA	REF SCALE 1:480	 data management analytics
DATE 5/17/2024	REVIEWED BY BC	MAP SCALE 1 INCH = 40 FEET	

From: [Jeffrey Karambelas](#)
To: [Siangkam, Emily \(she/her/hers\)](#); [Oquendo, Vanessa](#)
Cc: [Brad Jackson](#); [Donovan, Brenda](#)
Subject: ARCO 7155 - Response to Questions
Date: Thursday, October 31, 2024 2:51:13 PM
Attachments: [Outlook-aq logo.png](#)
[20241031_7155 EPA Response.pdf](#)

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hello,

Please see the attached responses to questions stemming from the EPA site visit to ARCO 7155 at 7301 Delridge Way SW, Seattle, WA.

Let us know if you have any further questions.

Thanks,

Jeffrey Karambelas | Project Manager

Antea®Group

Toll free +1 800 477 7411 | Mobile 503 705 5532

205 SE Spokane St, Suite 307, Portland, OR 97202

Jeffrey.karambelas@anteagroup.us | us.anteagroup.com



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October 31, 2024

Emily Siangkam
Surface Water Enforcement Section
Enforcement and Compliance Assurance Division
U.S. EPA Region 10**Subject: Response to 7301 Delridge Way SW, Seattle, WA – EPA Stormwater Inspection**

Dear Ms. Siangkam:

Antea[®]Group (Antea Group), on behalf of BP Products North America Inc. (BP), has prepared this letter in response to the United States Environmental Protection Agency (EPA) email correspondence requesting additional information dated September 17, 2024. The email was sent following a Site inspection of ARCO 7155 located at 7301 Delridge Way SW in Seattle, Washington (Site) on September 16, 2024. BP obtained coverage under the Washington Construction Stormwater General Permit (CSWGP) as part of upgrade activities of the fueling system and stormwater management system at the Site. The EPA Site inspection resulted in an email request for additional information. During the inspection, EPA personnel asked for updated figures showing the drainage structures and sample locations in a figure version that was separate from the Standard Drainage and Wastewater Control (DWC) Plan included in the SWPPP. Updated figures showing the stormwater conveyance and monitoring layout prior to construction and post construction are attached for reference. Specific items requested in EPA's email are discussed below.

1) Can you please reclarify which outfalls are which (i.e., Outfall 001-A, CB-2, CB-3, etc.)?

Outfall 001A is a municipal outfall located at Longfellow Creek approximately 700 feet north-northwest of the Site. This outfall is a 30-inch diameter reinforced concrete pipe owned by Seattle Public Utilities which drains the First Berkshire Properties parcel southwest of the Site. The onsite catch basins (CB-1, CB-2, and CB-4) collect stormwater from the driveways, roof drainage, and parking areas drain to an existing stormwater detention pond west of the property, under the Sherwin Williams store parking lot. CB-3 was located in the right-of-way of Delridge Way SW. There was no discharge from the Site and construction stormwater did not enter CB-3. As requested by the EPA during the inspection, catch basin numbers have been identified with outfall designations CB-1 as OF-1 and so forth.

2) Where/what are the exact locations that you are sampling from?

As Stormwater from the Site discharges to a detention facility monitoring points were added at each of the catch basins CB-1/OF-1, CB-2/OF-2, CB-3/OF-3 (did not receive construction stormwater), and CB-4/OF-4. Selecting multiple monitoring points allowed inspectors to identify areas of the Site with additional sediment loading to assist with selection and implementation of Best Management Practices (BMPs) in areas with observed impacts to stormwater.

3) Can you describe the flow path of stormwater at the site?

a. Where does stormwater go once it reaches each of those outfalls?

Stormwater enters the existing detention pond, located under the Sherwin Williams Parking lot, then discharges through the public stormwater conveyance piping north of the Site and ultimately discharges to Longfellow Creek.

b. Where does stormwater from the canopy go after it enters the retention strip?

Under-canopy area drainage enters the retention strip at the north end of the canopy, then the oil/water separator before entering the sanitary sewer system. This is a required source control measure per City of Seattle BMP 9: Fueling at Dedicated Stations. See Chapter 2, volume 4 of the Seattle Stormwater Manual.

4) Where does the water from the oil/water separator go?

Sanitary sewer, as required by the City of Seattle.

5) What is the function of the new catch basin that was built under the trash enclosure? Where does this go? Will this be monitored/sampled as well? Does this catch basin have a specific name?

The catch basin in the trash enclosure is required per City of Seattle BMP 4: Storage of Solid Waste. The catch basin is required to drain to the sanitary sewer system. The Catch basin is labeled as SSCB #1 on the approved Drainage and Waste Water Control Plan associated with this project's permit (6941109-CN).

Please let me know if you need any additional information pertaining to this project.
Sincerely,



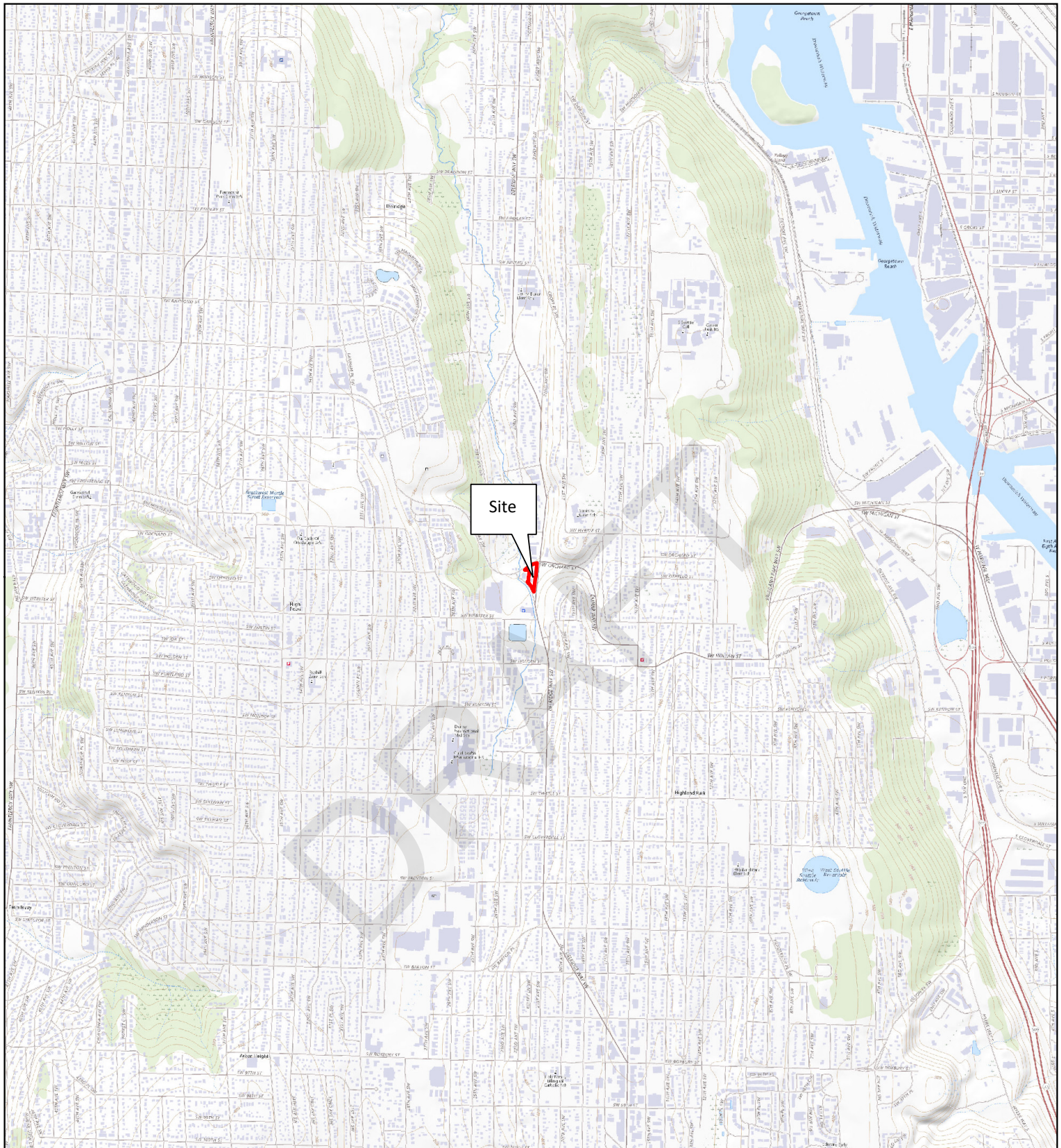
Jeffrey Karambelas
Project Manager
+1 503 705 5532
Jeffrey.karambelas@anteagroup.us
Antea Group

ENCLOSURES

Figure 1 – Site Location Map

Figure 2 – Pre-construction Stormwater Layout Map

Figure 2 – Post-construction Stormwater Layout Map



Site

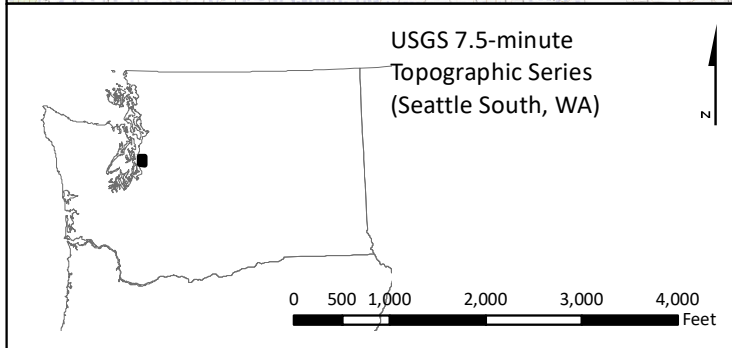


FIGURE 1

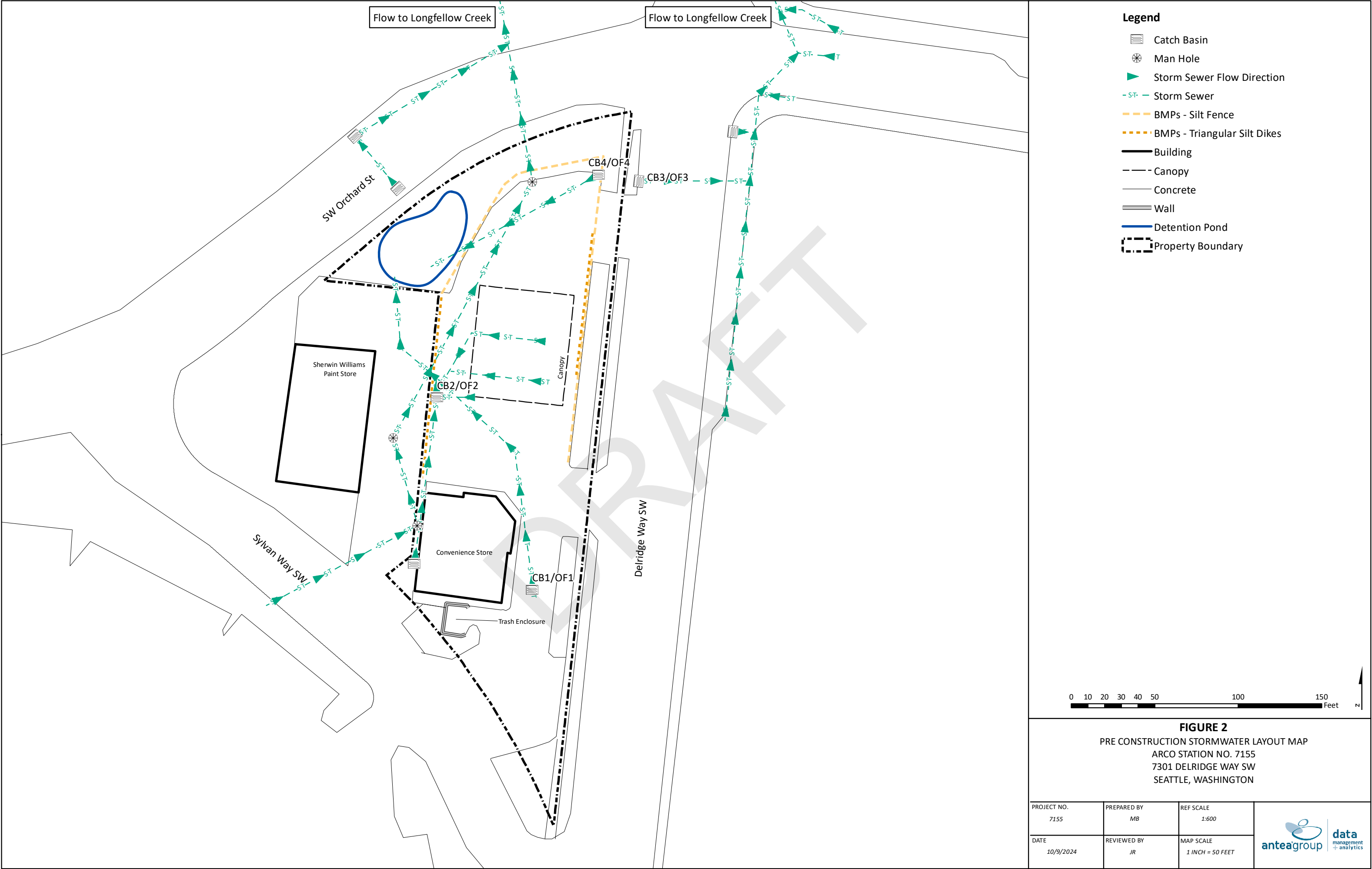
SITE LOCATION MAP

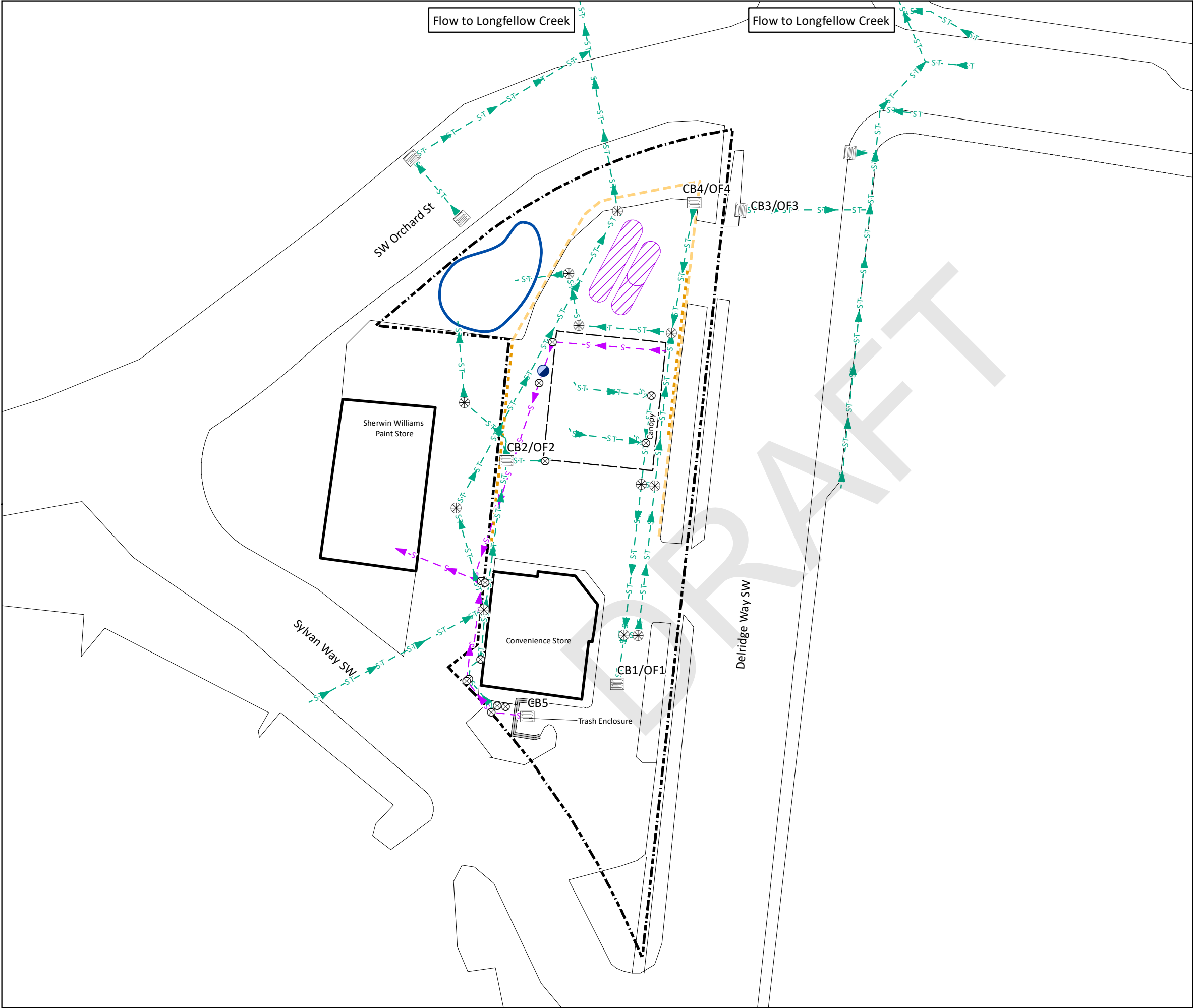
ARCO STATION NO. 7155

7301 DELRIDGE WAY SW

SEATTLE, WASHINGTON

PROJECT NO. 7155	PREPARED BY SAA	REF SCALE 1:24,000	
DATE 3/13/2024	REVIEWED BY BC	MAP SCALE 1 INCH = 2,000 FEET	





- Legend**
- Catch Basin
 - Man Hole
 - Cleanout
 - Oil/Water Separator
 - Sanitary Sewer Flow Direction
 - Storm Sewer Flow Direction
 - Sanitary Sewer
 - Storm Sewer
 - Building
 - Canopy
 - Concrete
 - Wall
 - Detention Pond
 - BMPs - Silt Fence
 - BMPs - Triangular Silt Dikes
 - UST Location
 - Property Boundary

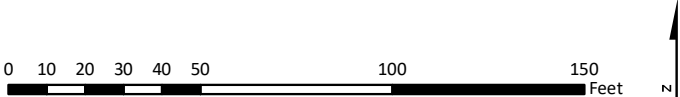


FIGURE 3 POST CONSTRUCTION STORMWATER LAYOUT MAP ARCO STATION NO. 7155 7301 DELRIDGE WAY SW SEATTLE, WASHINGTON			
PROJECT NO. 7155	PREPARED BY MB	REF SCALE 1:600	
DATE 10/9/2024	REVIEWED BY JR	MAP SCALE 1 INCH = 50 FEET	