UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

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

Subj: Inspection Report
Clean Water Act - National Pollutant Discharge Elimination System ("NPDES")
Shoreline Resources

From: Karissa Oakes, Inspector

Thru: Alex Rosenberg, Acting Manager

To: File

I. Facility Information

A. Facility Name: Shoreline Resources

B. Facility Location: 24 N. Front St.
New Bedford, MA 02740

C. Facility Contacts: Charlie Quinn, President
Shoreline Resources
26 N. Front St.
New Bedford, MA 02740
(508) 509-6620, charlie@quinnfisheries.com

D. NPDES ID No(s).: MAR1003T5 (CGP) / MAR05J08M (MSGP)

II. Background Information

A. *Date(s) of inspection:* May 30, 2024

B. *Weather Conditions:* Rain in the morning that stopped an hour before inspection totaling 1 inch, 60 degrees Fahrenheit

C. *US EPA Representative(s):*
Karissa Oakes, Inspector
Alex Rosenberg, Inspector

D. *State/Local Representative(s):*
None

E. *Federally Enforceable Requirements Covered During the Inspection:*
National Pollutant Discharge Elimination System Construction General Permit ("CGP") Effective February 17th, 2022

40 C.F.R. § 122.26 – NPDES Multi-Sector General Permit ("MSGP") for Stormwater Discharges Associated with Industrial Activity (issued January 15, 2021, modified September 29, 2021)

Section 311(j)(1)(C) of the Clean Water Act (CWA), 33 U.S.C. 1251 Spill Prevention, Control, and Countermeasure Plan

F. *Previous Enforcement Actions:*
None

III. Type and Purpose of Inspection

Routine Compliance Evaluation

IV. Facility Description

Shoreline Resources is a corporation that is implementing a large-scale redevelopment project on North Front Street in New Bedford, Massachusetts, (the "Site"), that is demolishing the prior tenant's copper mill to expand what is an on-going ship maintenance and repair business on the northern section of the site. There is major earthwork disturbance from the redevelopment and construction activities. A waterfront crane and supporting infrastructure such as a concrete pier are proposed within the construction plans. The site is approximately 5 acres, and is bordered by the Acushnet River to the East, North Front Street to the West, and commercial businesses to the North and South.

V. Inspection

Ms. Oakes and Mr. Rosenberg arrived on site, at approximately 10:00 AM, and requested access to the Site. Mr. Charlie Quinn granted access and said he and Ms. Franklin, a site employee, would accompany the U.S. Environmental Protection Agency (the "EPA") on the inspection.

A. Opening Conference

Mr. Charlie Quinn met Ms. Oakes and Mr. Rosenberg (the "EPA Inspectors") onsite and introduced himself as the company President. Ms. Oakes presented her credentials and explained the purpose of the inspection.

The opening conference occurred with Mr. Charlie Quinn and the EPA Inspectors at the main office located in the building located near the parking area for the Site. Mr. Mike Quinn, the Vice President and Site Operations Manager, and Ms. Franklin also attended the opening conference.

Ms. Oakes explained that EPA was present for a routine Site compliance inspection for the Clean Water Act. EPA Inspectors gave the Facility Representatives a copy of a 2021 letter in which EPA Region One explained the need for the Facility, recently under the new ownership of Shoreline Resources, to obtain coverage under the Multi Sector General Permit for Stormwater associated with industrial activities (MSGP). EPA Inspectors explained that no MSGP permit was currently on file for the Facility.

Mr. Charlie Quinn explained that the Site's long-standing environmental manager, who had run the prior owner's wastewater treatment plant and discharge permit and had stayed on in a similar capacity working for Shoreline Resources, had been tasked with applying for permit coverage under the industrial stormwater permitting in 2021. The employee was recently (in the past few months) converted from full time employment status to assisting shoreline resources on a temporary basis as a consultant.

Both Mr. Charlie Quinn and Mr. Mike Quinn expressed their confusion with the fact the MSGP had never been applied for. Mr. Mike Quinn spoke to the Licensed Site Professional, Al Hanson, on speakerphone and discussed applying for coverage. Mr. Hanson believes that he had done all the pre-requisite work in 2021 getting Shoreline Resources ready to submit their MSGP, NOI, and had passed the information to Mr. Mike Quinn.

Ms. Oakes asked Mr. Charlie Quinn about the availability of Stormwater Pollution Prevention Plans ("SWPPP") required pursuant to both the MSGP and CGP and Mr. Charlie Quinn said neither are available onsite and they would contact their Mr. Hanson for an electronic copy. Mr. Charlie Quinn was hopeful that the construction activity contractors might have the requisite permit documentation such as a SWPPP, training records and site inspection records.

Mr. Rosenberg asked Mr. Charlie Quinn about an estimated project completion timeline, and he explained that the company hopes to finalize all work by Spring 2025 and that all stormwater infrastructure would be installed within 30-60 days. Mr. Charlie Quinn explained that the Site's construction and demolition activities are being contracted to two operators, Coastal Marine Construction for the waterfront construction and Reliable Excavation for the demolition work.

EPA Inspectors additionally asked for a copy of the Site's Spill Pollution Prevention and Countermeasures Plan ("SPCC"). The plan was not present onsite.

Inspectors requested that plans be forwarded to the EPA when they are found. Subsequent to the inspection, on June 9,2024, the Facility Representatives forwarded

EPA a SWPPP for the Construction General Permit dated February 8, 2022, with revisions made on March 24, 2022 and June 29, 2022.

B. Facility Tour

The EPA Inspectors, Mr. Mike Quinn, and Ms. Franklin began the tour by walking along the North side of the Site, to the maintenance building. On the north side of the property, EPA Inspectors observed numerous fuel trucks that were parked in the main parking lot. EPA Inspectors asked Mr. Mike Quinn if these oil trucks were kept onsite with oil in their tanks and Mr. Mike Quinn said yes, and that they are owned by Fuel Man, a corporation that Mr. Mike Quinn also owns, whose headquarters are located on Pope's Island. Mr. Mike Quinn explained that the fuel company is currently constructing a fueling pier on Pope's Island that will increase the headquarters fuel storage and distribution capacity.

In front of the maintenance garage, there was one 275-gallon diesel storage tank that was connected to a generator that helped to power the maintenance shop.

A stormwater catch basin was located approximately 20 feet from both the generator and parked oil trucks (Photo 4).

Inside the vessel maintenance garage, EPA Inspectors noted seventeen 55-gallon oil drums that did not appear to have any means of secondary containment (Photos 7,8,9,10). EPA Inspectors told Mr. Mike Quinn that all oil storage containers with a capacity of 55-gallons or above are required to have sized secondary containment. The southern side of the maintenance shop is heated by a waste oil burner (Photo 11). The waste burner has an associated double-walled oil storage tank with an approximate capacity of 250-gallons.

The group continued the inspection through a door inside the garage building into what is the northern half of the maintenance garage. Located within this area, there were four 55-gallon oily solid drums and five totes of approximately 250 gallons capacity each containing used oil. None of the totes or drums had observable secondary containment (Photos 12,13). Facility Representatives stated that these totes and drums should not be stored in this location and that proper procedures are for any used oil to be immediately dropped to the site's oil storage location to the south of the garage building (Photos 17,18). EPA Inspectors requested further explanation of oil transfer procedures. Facility Representatives explained staff utilize dollies and forklifts to transport used oil containers to the oil storage aggregation area. There, a pump is used to transfer oil into the larger tanks.

Behind the maintenance garage, a single 275-gallon oil tank was present. Mr. Mike Quinn was unsure if it was active. The tank lacked secondary containment and appeared to be connected as the fuel source to an adjacent generator. One additional 55-gallon oil drums were observed without containment in this area, as well as two 55-gallon drums of spray foam. (Photos 14,15,16)

The group continued walking to the center of the Site, where most of the construction activity was occurring. EPA Inspectors observed the oil aggregation area that contains eight oil storage tanks of various sizes, is roofed and provides adequate secondary containment to all of the tanks (Photos 17,18). Facility Representatives were unsure of the exact sizes but believed most of the tanks had an 8,000-gallon capacity).

EPA Inspectors also observed numerous material stockpiles, approximately 20 feet tall that were all actively being used, as well as a pile of steel beams from the demolition work (Photo 20). Facility Representatives explained that most of the material such as soils, aggregate and bricks from the demolition process are being crushed and screened on-site for reuse in back filling the area adjacent to the newly installed sea wall.

EPA Inspectors continued the inspection by walking East, towards the waterfront. Located next to the waterfront was another building, where vessel maintenance and fabrication was observed. Facility Representatives explained that the metal that was being used to build the new pier for Fuel Man was painted in batches outside of the building. EPA Inspectors explained the existence of threshold quantities for painting over which a Facility is required to obtain a clean air act permit and explained the need for stormwater pollution control measures when conducting industrial activities outside of the building.

Behind this building, the property abuts the waterfront of the Acushnet River. Twelve commercial fishing boats, approximately 50 feet or greater in length, were moored against the property's sea wall. Facility Representatives explained that the newly installed seawall is impermeable and is installed approximately 30-40 feet into the river bottom. Facility Representatives also explained that during Site construction, shoreline resources had worked with EPA to safely deposit approximately 600,000 cubic yards of PCB contaminated soils in closed cells as part of EPA superfund clean-up activities. Facility Representatives explained that there are no longer PCB contaminated soils present on their site.

EPA Inspectors observed a barge in the water approximately 300 ft offshore to the North of Site with high levels of potential pollution present, from what was assumed to be vessel maintenance impossible vessel salvage operations (Photo 22). Facility Representatives explained that those activities and barge did not belong to them, and to the best of their knowledge, the municipality was actively communicating with the owners and operators of the neighboring activities.

The group continued walking South along the perimeter of the site along the waterfront. EPA Inspectors entered a barge adjacent to the site that was used to moor ships during general maintenance activities such as electronic system repairs and motor repairs.

Coastal Marine Construction was observed building a concrete foundation for the pier (Photo 28). The workers from this contractor are unaware of the construction general permit and any associated pollution prevention plans or records.

To the South of the construction workers, an approximately 75-foot-long section of concrete barrier was observed. The height of the concrete was approximately a few feet above the river. On the landward side of the barrier, exposed soils and material stockpiles were observed. EPA Inspectors asked what, if any, stormwater pollution control measures are implemented in this area of the Site to prevent material from discharging into the river. Facility Representatives explain that hay bales were used to line this area of the Site's border, but they had been removed in the past few days for ease of access during the concrete pouring. Accumulations of rainfall (puddles) were observed directly next to the concrete barrier within the unstabilized soil, providing evidence that stormwater flow does discharge into the river at this location due to the topography of the site (Photo 31). The majority of the site's demolition activities and material stockpiling occur within the catchment area of this discharge point.

At the southernmost extent of the Site, EPA Inspectors observed the delivery of concrete pipe sections that Facility Representatives explained would be used as the site's stormwater infrastructure.

Facility Representatives explained that a dedicated vessel washing area was part of the Facility design and that the wash water would not interact with the stormwater infrastructure.

EPA Inspectors observed two additional 55-gallon oil drums that did not appear to have containment (Photo 33) as well as two oil storage tanks (Photo 32). Facility Representatives asked the demolition contractor representative who was in the mobile office unit if they had CGP coverage. The demolition contractor was unaware which entity had applied for the CGP coverage. EPA Inspectors confirmed when they went back to the office that Mr. Charlie Quinn had been the one to apply for coverage.

Two 12,000-gallon capacity oil storage tanks were observed. Facility Representatives explained that these tanks are brand new and not currently in use and will be used at Fuel Man's headquarters on Pope's Island (Photo 35). The group returned to the entrance of the Site, where the tour was concluded.

C. Closing Conference

Mr. Mike Quinn told EPA Inspectors he would send an electronic copy of the SWPPP as soon as it was located, and a notice of when a Notice of Intent to discharge ("NOI") under the MSGP was complete and submitted. Ms. Oakes said she would send to the Facility Representatives a copy of the inspection report within 60 days.

EPA departed at approximately 12:00 PM.

On May 31, 2024 (one day after the inspection), Ms. Franklin emailed EPA Inspectors and submitted to them a copy of the Site's electronic SWPPP dated February 8, 2022. On June 9, 2024, Shoreline Resources submitted an NOI under the MSGP.

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

Photo Log Slide #	Image Descriptions
36	Delivery truck- delivering stormwater drainage
35	Unused oil storage tanks
34	Stockpiles
33	Oil drums in construction activity
32	Oil Storage Tanks
31	Water pooling along waterfront
30	Stockpiles
29	Shoreline
28	Concrete construction activity along waterfront
27	View from barge of construction activity
26	Stockpile
25	Boats and construction activity/stockpile
24	Boat along waterfront
23	Oil Tote
22	Barge (owned by company next door)
21	Construction activity in building next to waterfront
20	Steel beams from construction
19	Construction activity/stockpile in middle of site
18	Oil Tanks
17	Oil tanks
16	Oil tank behind maintenance shop-unsure if in use
15	Rusting oil drum behind maintenance shop
14	Oil drums behind maintenance shop
13	Oil totes inside maintenance shop
12	Oil drums and oil totes inside maintenance shop
11	Waste Oil Burner inside maintenance shop
10	Oil drums inside maintenance shop
9	Oil drum inside maintenance shop
8	Oil drums inside maintenance shop
7	Oil drums inside maintenance shop
6	Fuel tank hoses outside maintenance shop
5	Fuel tank outside maintenance shop
4	Main Parking Lot and Storm Drain

3	Fuel Truck (Fuel Man)
2	Site Aerial