



REGION 1

BOSTON, MA 02109

Dated as shown by electronic signature

Mr. Charlie Quinn
Site Operator/President
Shoreline Resources
24 N. Front St.
New Bedford, MA 02740

Dear Mr. Quinn:

On May 30th, 2024, the U.S. Environmental Protection Agency performed an inspection of Shoreline Resources ("Site") regarding compliance with the federal Clean Water Act ("CWA"). EPA inspectors evaluated compliance with the Oil Pollution Prevention Regulations (40 C.F.R. Part 112), as well as with respect to storm water discharges associated with industrial activity (40 C.F.R. § 122.26(b)(14)). The National Pollutant Discharge Elimination System ("NPDES") program for industrial discharges is most commonly implemented through the Multi-Sector General Permit ("MSGP") and Construction General Permit ("CGP").

A copy of the inspection report is enclosed with this letter. Provide responses and submissions to each numbered item below regarding the Site within 30 days of receipt of this letter to Karissa Oakes of my staff at oakes.karissa@epa.gov.

1. Regarding the Oil Pollution Prevention Regulations (40 C.F.R. Part 112)

Based on EPA's on-site compliance evaluation of the Site, it appears an oil discharge from the Site could reasonably be expected to enter nearby surface waters and therefor the Site may be subject to 40 C.F.R. Part 112.

- A. Identify the total oil storage capacity of the Site, and list each oil receptacle, its contents, and rated volume. This should include every receptacle that is rated to store 55 gallons or more, and should include the capacities of each of the eight oil storage tanks located next to the maintenance garage (photos 17 and 18).
- B. Provide photos of the containment methods used for all oil drums and totes stored in the maintenance garage.
- C. If the Site has a total oil storage capacity above the thresholds set forth in 40 C.F.R. § 112.1(d)(2) (i.e., greater than 1,320 gallons of aboveground capacity) state whether the Site has a Spill Prevention, Control, and Countermeasure ("SPCC") Plan and provide a copy of the SPCC Plan to EPA. If the Site is required to have an SPCC Plan and does not have one, indicate by when it will provide one to EPA.

2. Regarding the Multi-Sector General Permit and the Construction General Permit (40 C.F.R. § 122.26)

- A. EPA Inspectors observed the delivery of stormwater piping during the inspection. Provide a description of where the new stormwater piping will be installed on the site. Provide any existing engineering plans/drawings detailing stormwater conveyance systems such as outlet structures, their piping, and their outfall locations and/or where these systems are joined with other stormwater systems.
- B. According to Part 4.2 of the CGP, site inspections must be conducted at least once every seven (7) calendar days; or once every 14 calendar days and within 24 hours of the occurrence of a storm event that produces more than 0.25 inches of precipitation within 24-hours. Provide copies of all inspection reports from the past six months.
- C. Provide the Facility's Stormwater Pollution Prevention Plan ("SWPPP") as required in Part 1.3.1 of the MSGP. This is different than the SWPPP required for the CGP. If the Site does not have a SWPPP for MSGP discharges associated with industrial activity, indicate when it will provide one to EPA.

Please refer and technical questions regarding this letter to Ms. Oakes at 617-918-1060 or at oakes.karissa@epa.gov. Legal issues may be directed to Jeff Kopf, Senior Enforcement Counsel, at (617) 918-1796 or at kopf.jeff@epa.gov.

Sincerely,
TODD
BORCI
Todd Borci,

Acting Manager Water Technical Unit 1
Enforcement Compliance Assurance Division

Digitally signed by
TODD BORCI
Date: 2024.08.06
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ENCLOSURES

Inspection Report and Photo Album for May 30, 2024, EPA Inspection

cc: Jeff Kopf, US EPA
Karissa Oakes, US EPA