

UNPERMITTED INDUSTRIAL FACILITY STORMWATER INSPECTION CHECKLIST

Inspection Date	May 13, 2024	
Time	Entry: 1:00 PM	Exit: 3:30 PM
Weather Conditions	80°F and Sunny	
Media/Program	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	Waterview Marinas	
Facility or Site Name:	Silver Lake Marina	
Permit ID or Tracking #:	N/A; No permit at the time of the inspection	
SIC Code:	SIC Code 4493 – Marinas, based on visual observations by the EPA Inspection Team.	
Facility Address:	2500 Fairway Dr #1	
(city, state, zip code)	Grapevine, TX 76051	
Geographic Coordinates:	32.954525°, -97.058697°	
Mailing address:	2500 Fairway Dr #1	
(city, state, zip code)	Grapevine, TX 76051	
County:	Tarrant County	
Regular Days/Hours of Operation:	10:00 AM – 6:00 PM (Sunday-Saturday)	
# of Employees at location:	5	
Size of Facility (in acres):	50 acres	
Receiving Water(s):	Grapevine Lake	
Date facility est. @ location:	Around 1980	
Onsite Representatives:		
Name: John Swick	Title: Principal	Phone: (469) 956-5012
	Email: jswick@waterviewmarinas.com	
Authorized Official:	Contacted? x Yes No	
Name: John Swick	Title: Principal	Phone: (469) 956-5012
	Email: jswick@waterviewmarinas.com	
Additional Personnel Participating in Inspection:		
Name: N/A	Title: N/A	
Inspector(s):	Title:	Company:
Chris Pardo	Lead Inspector	Eastern Research Group, Inc.
Ryan Marrero-Vila	Inspector	Eastern Research Group, Inc.
Carol Johnson	Inspector	Environmental Protection Agency, Region 6
Destinee Agwuna	Inspector	Environmental Protection Agency, Region 6

Inspection Report Author:		
Name: Chris Pardo	Signature: CPardo	Date: June 10, 2024
Supervisor Review:		
Name: Lori Tanner (acting for Ruben Alayon-Gonzalez)	Signature: <i>Lori Tanner</i>	Date 07/10/2024

SECTION I – INTRODUCTION

Purpose of the Inspection

The purpose of the inspection was to determine compliance with the industrial stormwater requirements under §§ 301 and 402(p) of the Clean Water Act (CWA) and its implementing regulations found at 40 Code of Federal Regulations (CFR) Part 122.26. The inspection was unannounced and consisted of interviewing Facility representatives, recording field observations, and taking photographs to document site conditions throughout the Facility at the time of the inspection.

Opening Conference

- 1) Brief narrative documenting those present, introductions, presentation of credentials, and explanation of the purpose of the inspection.

On May 13, 2024, a U.S. Environmental Protection Agency (EPA) contractor, Eastern Research Group, Inc. (ERG), conducted an industrial stormwater non-filer inspection at Silver Lake Marina located in Grapevine, Texas (Facility). Carol Johnson and Destinee Agwuna of EPA Region 6, and Chris Pardo and Ryan Marrero-Vila of ERG (collectively, EPA Inspection Team) met with the Facility representative, John Swick. The EPA Inspection Team presented their credentials and explained that it was EPA's understanding that the Facility did not have an industrial stormwater permit. The EPA Inspection Team explained they were onsite to conduct a Clean Water Act stormwater inspection, which includes observing the current operations of the facility and assessing the potential for stormwater discharges from the Facility.

The weather at the time of the inspection was sunny and approximately 80°F. According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA)¹, the Grapevine, Texas area received .23 inches of rain the day prior to the inspection and 0.59 inches of rain the day of the inspection.

- 2) Credentials presented to: John Swick (Principal of Waterview Marinas)
- 3) Facility acknowledged receiving previous outreach materials or correspondence on Permit requirements?

☐ Yes ☒ No Describe: The Facility did not acknowledge receiving previous outreach materials since 2016 when the Facility's Texas Commission on Environmental Quality (TCEQ) Stormwater Multi-Sector General Permit expired.

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

4) Facility has been individually notified by permit authority or EPA that it is subject to stormwater requirements?

☐ Yes ☒ No Describe: N/A

FACILITY'S OPERATION & PRODUCT DESCRIPTION

Description of business and industrial activities occurring throughout the site. (Include operator's description and note any documentation that further establishes SIC code (permit applications, reports, business registries, website...)).

The Facility is a boat storage and fueling marina located at the southeastern corner of Grapevine Lake with approximately 600 wet-slips (refer to Appendix B, Photographs 8, 19, and 20). Approximately 550 of these boat slips are canopy-covered. The Facility also has both open and closed dry storage lots for boats and boat trailers (refer to Appendix B, Photographs 22-25, and 40-45). The Facility offers on-water fueling (gasoline) via two (2) fueling stations located on the dock (refer to Appendix B, Photographs 10-14) and other amenities such as shopping and dining for members of the marina.

The land portion of the Facility covers approximately 50 acres and includes three (3) parking lots, two (2) areas for boat/trailer storage, two (2) recreational areas (refer to Appendix B, Photographs 34-39), and one (1) area for miscellaneous parts storage (refer to Appendix B, Photographs 28-33). The Facility also includes one (1) maintenance warehouse for storage of groundskeeping equipment such as leaf blowers and lawnmowers (refer to Appendix B, Photograph 1). Additionally, the warehouse is used for construction of concrete wave attenuators and the storage of associated materials such as steel beams and wood (refer to Appendix B, Photographs 5-7, 46-52, and 55).

The Facility was previously permitted under a TCEQ Texas Pollutant Discharge Elimination System (TPDES) Stormwater

Multi-Sector General Permit for Industrial Facilities. The Facility was permitted under Industrial Subsectors Q & R from 2013 to 2016 (TXR05BV74). According to the Facility Representative, the Facility had filed a Notice of Termination (NOT) due to no boat repair or maintenance services being offered at the Facility. The EPA Inspection Team did not observe boat repairs or maintenance being conducted.

Other industrial facilities owned/operated by same business entity? x Yes or No Describe:

The Facility is owned/operated by Waterview Marinas which has seven (7) marinas across three states. Two (2) in Oklahoma, four (4) in Texas, and one (1) in Florida according to the Waterview Marinas website, <https://waterviewmarinas.com/twin-coves-marina/>.

SECTION II – OBSERVATIONS

SITE EVALUATION	
Pollutant Sources	Note location, quantity/size, design issues, any O&M deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are BMPs in place to minimize or eliminate stormwater discharges from industrial activities?
Loading/Unloading Operations	A third-party mobile fuel truck delivers gasoline into the Facility's 12,000-gallon double walled aboveground storage tank (AST) located at the southern portion of the Facility (refer to <u>Appendix B, Photographs 3, 4, and 21</u>).

SITE EVALUATION	
Pollutant Sources	Note location, quantity/size, design issues, any O&M deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are BMPs in place to minimize or eliminate stormwater discharges from industrial activities?
Industrial Manufacturing/Processing Operations	The Facility fabricates concrete wave attenuators within (2) two areas of the property. The Facility pours concrete into molds at the miscellaneous storage area located in the central portion of the Facility (refer to <u>Appendix B, Photographs 26 and 31</u>) and further processes and finishes the concrete wave attenuators within the maintenance warehouse located in the southern portion of the Facility (refer to <u>Appendix B, Photographs 1, 5, 6, and 47-49</u>).
Industrial Machinery & Equipment Storage	The Facility has the following equipment carts for moving boats, trailers, guests, and materials around the Facility: three (3) pickup trucks, one (1) front-end loader, one (1) telescopic forklift, and multiple golf carts. Equipment was located throughout the Facility (refer to <u>Appendix B, Photographs 7, 46, and 52</u>).

Storage of Industrial Materials or Products	The EPA Inspection Team observed steel beams, steel wires, cinder blocks, and wooden planks associated with the fabrication of concrete wave attenuators stored within the earthen yard adjacent to the maintenance warehouse (refer to <u>Appendix B, Photographs 1, 7, 46, 52 and 55</u>). At least one (1) package of industrial materials stored outside was wrapped in cardboard and packing tape (refer to Appendix B, Photograph 46). Some materials were stored on pallets, others were stored directly on the gravel ground. The EPA Inspection Team observed a miscellaneous storage area in the center of the Facility, which was used to store six (6) concrete molds, black polyethylene dock floats, old Styrofoam dock floats, at least eight (8) large rubber tires, miscellaneous boat lift equipment, and an out-of-service shuttle cart (refer to <u>Appendix B, Photographs 26-33</u>). Two (2) 30 cubic yard solid waste roll-off dumpsters were exposed to stormwater and contained broken pieces of concrete and old Styrofoam dock floats. Materials, including Styrofoam boat docks were degrading. All materials were stored uncovered and exposed to stormwater.
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	The EPA Inspection Team observed one (1) double-walled 12,000-gallon gasoline AST located in the southern portion of the Facility approximately 200 feet upgradient of Grapevine Lake (refer to <u>Appendix B, Photographs 3, 4, and 21</u>). This gasoline tank connects to the fueling stations on the dock via underground pipes and fuel lines under the docks. The EPA Inspection Team observed a one-gallon jug of spot remover which was located in one of the boat slips rented to a Facility boat owner (refer to <u>Appendix B, Photograph 18</u>). The manufacturer of Babe's Spot Solver states that the product is "an environmentally safe, non-abrasive solution designed for all gelcoat, glass and chrome surfaces." (https://psdetailproducts.com/collections/babes-boat-careproducts/products/babes-spot-solver-16-oz-w-sprayer) The Safety Data Sheet for the product categorizes the product's severity as "Danger."

SITE EVALUATION	
Pollutant Sources	Note location, quantity/size, design issues, any O&M deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are BMPs in place to minimize or eliminate stormwater discharges from industrial activities?
Waste Storage/Disposal Areas (solid and/or hazardous)	The EPA Inspection Team observed two (2) 30 cubic yard solid waste roll-off dumpsters located in the central portion of the Facility. The roll-offs contained broken pieces of concrete and old Styrofoam dock floats (refer to <u>Appendix B, Photographs 26 and 27</u>). The roll-offs were uncovered and exposed to stormwater. The EPA Inspection Team observed a used vehicle maintenance fluid storage station located within the metal warehouse in the southern portion of the Facility (refer to <u>Appendix B, Photographs 50 and 51</u>) where minor maintenance, such as oil and fluid changes, on Facility pickup trucks occurred. The EPA Inspection Team observed one (1) 55-gallon drum of used oil, two (2) 5-gallon buckets of used oil, two (2) diesel cans and multiple miscellaneous smaller bottles stored over spill containment pallets. Two (2) gas cans were stored outside the containment pallets.
Waste Treatment Facilities (e.g., Pretreatment Systems)	None observed or reported at the Facility.
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	The EPA Inspection Team observed two (2) gasoline fueling stations located on the eastern portion of the docks which were connected to the 12,000-gallon gasoline tank via underground pipes and fuel lines under the docks (refer to <u>Appendix B, Photographs 10-14</u>). According to the Facility representative, the fueling stations are self-service by marina members. No spill kits were observed on the docks or near the fueling stations.
Sediment & Erosion Controls	The EPA Inspection Team did not observe any sediment and erosion controls at the Facility.
Spills/Leaks Handling	The EPA Inspection Team did not observe any spill kits located near potential sources of contamination (e.g., fueling areas). According to the Facility representative, the Facility keeps response booms in the maintenance warehouse to contain spilled fluids at the fueling areas.

Outside Shelters	Temporary (Date Established <u>N/A</u>) x Permanent The EPA Inspection Team observed approximately twenty canopy-style awnings over the water/docks which were between 100-300 feet in length (refer to <u>Appendix B, Photographs 8, 19, and 20</u>). These awnings covered the boat slips which were located directly underneath. Additionally, in the southeastern portion of the Facility, the EPA Inspection Team observed four covered dry boat storage buildings ranging in length from 100'-200' in length (refer to <u>Appendix B, Photographs 22, 23, and 40-42</u>). Each building contained multiple self-service storage boat lots which could be leased to marina members.
SITE EVALUATION	
Pollutant Sources	Note location, quantity/size, design issues, any O&M deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are BMPs in place to minimize or eliminate stormwater discharges from industrial activities?
Evidence of nonstormwater sources/discharges (allowable if permitted under MSGP)?	Evidence of non-stormwater sources/discharges were not observed during the inspection.
Evidence of process wastewater sources/discharges?	Evidence of process wastewater sources/discharges were not observed during the inspection.

OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
Number and description of each potential Stormwater Discharge Point from the Facility	The Facility grade slopes down towards Grapevine Lake. Stormwater from the entire land portion of the Facility would convey as overland flow into the lake (refer to Appendix A, Figure 1 and <u>Appendix B, Photographs 2, 3, and 33</u>). In addition, all uncovered boat docks were located directly over the lake and would directly discharge any stormwater and accompanying pollutants into Grapevine Lake (refer to <u>Appendix B, Photographs 8 and 10-15</u>).

Evidence of pollutants migrating offsite (stains, deposits, ponding) at discharge points, into receiving waters or in MS4	Evidence of pollutants migrating offsite were not observed during the inspection.
Evidence of Nonstormwater Discharges leaving site (authorized or unauthorized)	Evidence of non-stormwater discharges were not observed during the inspection.
Description of general gradients/slopes onsite, all apparent discharge points, and discharge pathway from Facility to Receiving Water or MS4 (storm drains, channel, swale, ditches, driveway, pipes, & etc.)	The EPA Inspection Team observed all areas of the Facility graded westward (northwest and southwest) downwards towards Grapevine Lake (refer to Appendix A, Figure 1 and <u>Appendix B, Photographs 10, 20, and 21</u>). Per the gradient, stormwater overland flow would travel westward down the vegetated/grassy surfaces, gravel surfaces, and the paved road surfaces into the lake (refer to Appendix A, Figure 1 and <u>Appendix B, Photographs 2, 3, 21, 31, 3336, 43, 45, .</u>).

SECTION III – AREAS OF CONCERN 1) At the time of the inspection, the EPA Inspection Team identified the following at the Facility:

- a. The Facility provides boat storage wet-slips, dry storage boat lots, and on-site boat fueling (SIC Code 4493 – Marinas). SIC Code 4493 is regulated under 40 C.F.R. § 122.26 for stormwater discharges associated with industrial activity.
 - b. The Facility's maintenance warehouse and outdoor areas were used for manufacturing concrete wave attenuators, which included pouring and storing concrete molds.
 - c. At the time of the inspection, the Facility did not have coverage under the 2021 Multi-General Stormwater Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity.
 - d. Facility stormwater from the areas used for concrete wave attenuator manufacturing at the maintenance warehouse and the concrete pouring station discharge into Grapevine Lake, which serves as the western border of the Facility. The entire Facility is graded towards Grapevine Lake, and subsequently stormwater would flow into the lake.
- 2) The EPA Inspection Team observed no spill kits located near potential sources of pollution such as the Facility's two fueling stations (refer to Appendix B, Photographs 10-14).
 - 3) The EPA Inspection Team observed an outdoor area used to pour concrete located approximately 450 feet upgradient from Grapevine Lake (refer to Appendix B, Photograph 26). The EPA Inspection Team observed approximately six (6) concrete molds which were stored over the grass as well as fragments of concrete waste which were stored on the grass or within the two (2) 30 cubic yard solid waste roll-off dumpsters. No lid/cover was observed on the roll-off dumpsters (refer to Appendix B, Photograph 27).

SECTION IV – LIST OF APPENDICES

Appendix A – Aerial Location

Appendix B – Photograph Log