EPA

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1	WAR305116	190328	~	R	2

Remarks

21 ____ 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 10 69	70	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
KAG West, LLC 401 E. Alexander Ave, Tacoma, WA 98421	3/28/19 / 10:45AM	March 2, 2017
	Exit Time/Date	**Permit Expiration Date**
	3/29/19 / 1:00PM	December 31, 2019

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Ben Nelson, Terminal Manager
Cell Phone: Ex. 6 - Personal Privacy
Email: ben.nelson@thekag.com

Name, Address of Responsible Official/Title/Phone and Fax Number

Ben Nelson, Terminal Manager
401 E. Alexander Ave, Tacoma, WA 98421
Cell Phone: Ex. 6 - Personal Privacy
Email: ben.nelson@thekag.com

Contacted ☑ Yes ☐ No

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

SIC 4231 - Trucking Terminal Facilities
NAICS 488490 - Other Support Activities for Road Transportation

Industrial Stormwater General Permit

KAG West, LLC is a subsidiary of the Kenan Advantage Group, Inc.

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☑ Permit	☑ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☑ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
☑ Facility Site Review	☐ Laboratory	☑ Storm Water	
☑ Effluent/Receiving Waters	☑ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes SEV Description

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Matt Vojik	EPA/OCE / 206-553-0716	4/1/2019
Rachel Stephenson	EPA/OCE / 206-553-6366	
Jon Jones	EPA/OCE / 907-271-6329	
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
	EPA/ECAD/206 5536708	6.7.19

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

AWR 1C15 4/22/19

NPDES Inspection Report

Permit # WAR305116

KAG West, LLC

Tacoma, WA

March 28-29, 2019

Prepared by:

Matt Vojik
Environmental Protection Agency (EPA), Region 10 (R10)
Enforcement & Compliance Assurance Division (ECAD)
Water Enforcement & Field Branch (WEFB)
Field, Data & Drinking Water Enforcement Section (FDDWES)

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ATTACHMENT A – Site Map
ATTACHMENT B – Photograph Log

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Ben Nelson or from observations during the inspection.)

I. Facility Information

Facility Name:	KAG West, LLC
Facility Owner/Operator:	Kenan Advantage Group. Inc.
Property Owner:	Port of Tacoma
Physical/Mailing Address:	401 E. Alexander Ave, Tacoma, WA 98421
Lat/Long:	+47.280857, -122.410133
SIC Code:	4231 - Trucking Terminal Facilities
NAICS Code:	488490 - Other Support Activities for Road Transportation
Facility Contacts:	Ben Nelson, Terminal Manager Cell Phone: (b) (6) Email: ben.nelson@thekag.com Mike Tran, Consultant, Frog Environmental 800 E. Ocean Blvd, Suite 105, Long Beach, CA 90802 Phone: 310-241-0866 Toll Free Phone: 877-FROG-ENV Fax: 310-241-1442 Email: MikeT@FrogEnv.com
Permit Number:	WAR305116
Receiving Water:	Blair Waterway and Commencement Bay

II. Inspection Information

Inspection Dates:	March 28-29, 2019
Inspectors:	Matt Vojik, EPA/R10/ECAD/WEFB/FDDWES Rachel Stephenson, EPA/R10/ECAD/WEFB/FDDWES Jon Jones, EPA/R10/ECAD/WEFB/FDDWES (March 28th only)

	March 28, 2019	March 29, 2019
Arrival Time:	10:45 AM	11:40 AM
Departure Time:	11:50 AM	1:00 PM

Weather:	Sunny
Purpose:	To determine whether the facility is in compliance with their National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act.

III. Permit Information

This facility is permitted under the Washington State Department of Ecology (Ecology) Industrial Stormwater General Permit (ISGP) with the permit number WAR305116. The facility's permit coverage became effective on March 2, 2017. The permit has an expiration date of December 31, 2019.

IV. Background

KAG West is a subsidiary of the Kenan Advantage Group[1], North America's largest tank truck transporter and logistics provider. The Kenan Advantage Group operates approximately 300 terminal and satellite locations, delivering fuels, chemicals, specialty products, food products and industrial gases. KAG West has operated out of the Tacoma site since 2017. The facility is located in the Earley Business Center, which houses multiple industrial facilities on property owned by the Port of Tacoma. The property had previously been used as a shipbuilding facility.

According to Ecology's Permitting and Reporting Information System (PARIS) database, the facility has not previously been inspected for compliance with the ISGP.

V. Inspection Chronology

The inspection team arrived at the facility at 10:45am on March 28, 2019 to conduct an unannounced inspection. The office trailer in the main trucking lot was locked and vacant at the time of our arrival. We spoke to a driver, who informed us that Mr. Ben Nelson, Terminal Manager, was working at their Seattle location for remainder of the day. The driver tried to call Mr. Nelson, but was unable to reach him. I also called Mr. Nelson, but received an automated message that his voicemail was full. We proceeded to the maintenance shop. I presented my credentials to Mr. Rikk Martin, Maintenance Manager, and provided him an EPA Small Business Resources Information Sheet. We explained that the purpose of our visit was to conduct a compliance inspection under the ISGP. Mr. Martin said that he was unfamiliar with the ISGP and he was busy conducting an equipment inventory, but he gave us permission to tour the outdoor areas of the facility on our own. We walked around the truck yard and then returned to the maintenance shop to provide a summary of our observations to Mr. Martin. We were not denied access to the facility.

[1] www.thekag.com

On March 29, 2019, I called Mr. Ben Nelson and made arrangements to return to the facility to complete the inspection. We held a brief opening conference with Mr. Nelson in his office. We conducted a file review, took a tour of the truck yard and ended with a closing conference to discuss observations and next steps. We were also accompanied by Mr. Mike Tran from Frog Environmental, who had recently been contracted to provide stormwater consulting services and was visiting the facility for the first time.

VI. Opening Conference

Mr. Nelson has worked for KAG West since 2001 and manages two additional yards in Seattle, WA and Ferndale, WA. The Tacoma facility includes 38 tanker trucks, 66 drivers and four employees in the maintenance shop.

VII. Site Review

On March 28, 2019, we toured the exterior of the vehicle maintenance building and parts of the truck yard with the permission of Mr. Martin. On March 29, 2019, Mr. Nelson took us on a tour of the truck yard. A facility site map appears in **Attachment A** and a photograph log appears in **Attachment B**.

Outside the maintenance shop (**Photo 1**), we observed an open dumpster (**Photo 2**) and a blue barrel (**Photo 3**) that contained fluid. The barrel was labeled as windshield wash (**Photo 4**).

In the north parking area, we observed tanker trucks (**Photo 5**) and some stains on the pavement (**Photo 6**). We inspected the supply sheds, which held flammable liquids and a spill kit. We also inspected various storm drains located near the supply sheds (**Photo 7**), near the office trailer (**Photo 8**) and in the center of the north parking area (**Photo 9**). We also observed one storm drain (**Photo 10**) near a parked tanker truck (**Photo 11**), where we also observed sheen on the pavement (**Photo 12**). We also inspected the area around the facility's fueling truck (**Photo 13**), where we observed staining on the pavement (**Photo 14**) and a tote (**Photo 15**) positioned over a secondary containment tray (**Photo 16**).

In the south corner of the north parking area, we also observed dried mud and debris (**Photo 17**) where stormwater had previously accumulated. Mr. Nelson said that the facility also receives run-on during storm events from a neighboring industrial facility southeast of the north parking area. He showed us the base of the southeast fence line, where an angle iron (**Photo 18**) was installed last summer to serve as a flow barrier between the two facilities.

VIII. File Review

We reviewed the following records:

- Stormwater Pollution Prevention Plan (SWPPP) dated April 25, 2016
- Monthly site inspection records for the period of May 2017 to March 2019

IX. Areas of Concern

I noted the following areas of concern:

A. Fuel Transfer Containment Measures

Condition S3.B.4.b.i.4)f) of the ISGP states that the Permittee shall "use drip pans or equivalent containment measures during all petroleum transfer operations."

During the inspection, we inspected the fueling truck in the north parking area and observed petroleum transfer operations (**Photos 13 and 14**) without the use of drip pans or equivalent containment measures. We also observed stains on the pavement in the vicinity of the fueling truck (**Photos 13 and 14**).

B. Vehicle Drips and Leaks

Condition S3.B.4.b.i.3)c) of the ISGP states that the Permittee must "take leaking equipment and *vehicles* out of service or prevent leaks from spilling on the ground until repaired."

In addition to the area around the fueling truck described above, in the north parking area, we observed some stains on the pavement (**Photo 6**) and sheen (**Photo 12**) under one tanker truck parked near a storm drain (**Photo 11**).

C. Secondary Containment

Condition S3.B.4.b.i.4)a) of the ISGP states that the Permittee shall "store all chemical liquids, fluids, and petroleum products, on an impervious surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed tank volume or 110% of the volume contained in the largest tank, whichever is greater."

Outside the maintenance shop (**Photo 1**), we observed a blue barrel (**Photo 3**) that contained fluid. The barrel was labeled as windshield wash (**Photo 4**) and was exposed to stormwater without secondary containment.

In the north parking area, we also observed a tote (**Photo 15**) positioned over a secondary containment tray (**Photo 16**). It was unclear whether the containment tray was large enough to contain 110% of the volume of the tote.

D. Uncovered Dumpsters

Condition S3.B.4.b.i.2)d) of the ISGP states that the permittee shall "keep all dumpsters under cover or fit with a lid that must remain closed when not in use."

Outside the maintenance shop (**Photo 1**), we observed an open dumpster (**Photo 2**) that was not equipped with a lid. Covering dumpsters is also identified as a good housekeeping practice in Section 3.5 of the facility's SWPPP.

E. BMP Maintenance

Condition S3.B.4.b.i.2) of the ISGP states that "the SWPPP shall include BMPs that define ongoing maintenance and cleanup, as appropriate, of areas which may contribute *pollutants* to *stormwater* discharges."
AND
Condition S3.B.4.b.i.3. of the ISGP states that "the SWPPP shall include BMPs to inspect and maintain the *stormwater* drainage, source controls, treatment systems (if any), and plant equipment and systems that could fail and result in contamination of *stormwater*.
AND
Condition S3.A.1. of the ISGP states that all Permittees shall "implement a SWPPP."

We noted that the facility's SWPPP identified some best management practices (BMPs) for maintenance and cleanup of drainage controls and industrial areas. However, in addition to the areas of concern described above, we made the following observations that BMPs implementation and maintenance could be improved to prevent the contribution of pollutants to stormwater:

- Mr. Nelson showed us the location of a storm drain covered in sediment (**Photo 8**) near the office trailer.
- We noted that some storm drains were equipped with filter inserts that showed signs of wear (**Photo 10**) and sediment build-up (**Photo 7**)
- We observed dried mud and debris (**Photo 17**) where stormwater had previously accumulated in the south corner of the north parking area.
- Mr. Nelson also showed us an angle iron (**Photo 18**) installed last summer to serve as a flow barrier along the southeast fence line, but it was unclear if this barrier was adequate to block run-on of potential contaminants from the neighboring facility.

F. Lack of Discharge Monitoring and Reporting

Condition S4.B.1.a. of the ISGP states that "the Permittee shall sample the *discharge* from each designated location at least once per quarter."
AND
Condition S9.A.1. of the ISGP states that "the Permittee shall submit sampling data obtained during each reporting period on a Discharge Monitoring Report (DMR)."

Based on the information available on Ecology's PARIS database and conversations with Mr. Nelson, the facility had not sampled any discharges or submitted any DMRs to Ecology under the ISGP. Information in PARIS also indicates that Ecology sent letters to KAG West on June 21, 2018 and September 20, 2018 to notify the facility that required DMRs had not been submitted.

G. SWPPP Sampling Plan

Condition S3.B.5. of the ISGP specifies requirements for a SWPPP sampling plan, including identification of "each sampling location."
AND
Condition S4.B.1.d. of the ISGP states that "the Permittee shall obtain *representative samples.*"

AND
Appendix 2 of the ISGP states that "*representative* [sample] means a sample of the *discharge* that accurately characterizes *stormwater runoff* generated in the designated drainage area of the *facility*."

I noted that Section 3.3.2 of the SWPPP identifies the sampling locations as "Outfall #1, Outfall #2, and Outfall #3 identified on the *Site Location Map*" (**Attachment A**). Mr. Nelson said that Outfall #1 is typically submerged in Commencement Bay and inaccessible for sampling. I also noted that the outfalls may received comingled flows from multiple facilities in the area and therefore, the outfalls may not be adequately representative of stormwater runoff from the facility. I advised Mr. Nelson to consider sampling points that are more accessible and representative.

H. Annual Reporting

Condition S9.B.1. of the ISGP states that "the Permittee shall submit a complete and accurate Annual Report to the Department of *Ecology* no later than May 15th of each year."

Based on the information available on Ecology's PARIS database and conversations with Mr. Nelson at the time of the inspection, the facility had not submitted any annual reports to Ecology under the ISGP.

I. SWPPP Training

Condition S3.B.4.b.i.5) of the ISGP states that "the SWPPP shall include BMPs to provide SWPPP training for employees who have duties in areas of industrial activities subject to this permit."

We noted that the Section 3.8 of the SWPPP included BMPs for annual employee training, but the facility did not have any training records and Mr. Nelson was not aware of any SWPPP trainings that hand been conducted.

J. SWPPP Site Map Drainage Structures

Condition S3.B.1.c. of the ISGP states that the SWPPP site map shall identify "the *stormwater* drainage and *discharge* structures."

In the center of the north parking area, we observed long narrow grates (**Photo 9**) that looked like storm drains, but they were not clearly indicated on the SWPPP site map (**Attachment A**), and Mr. Nelson was not sure where they drained.

X. Closing Conference

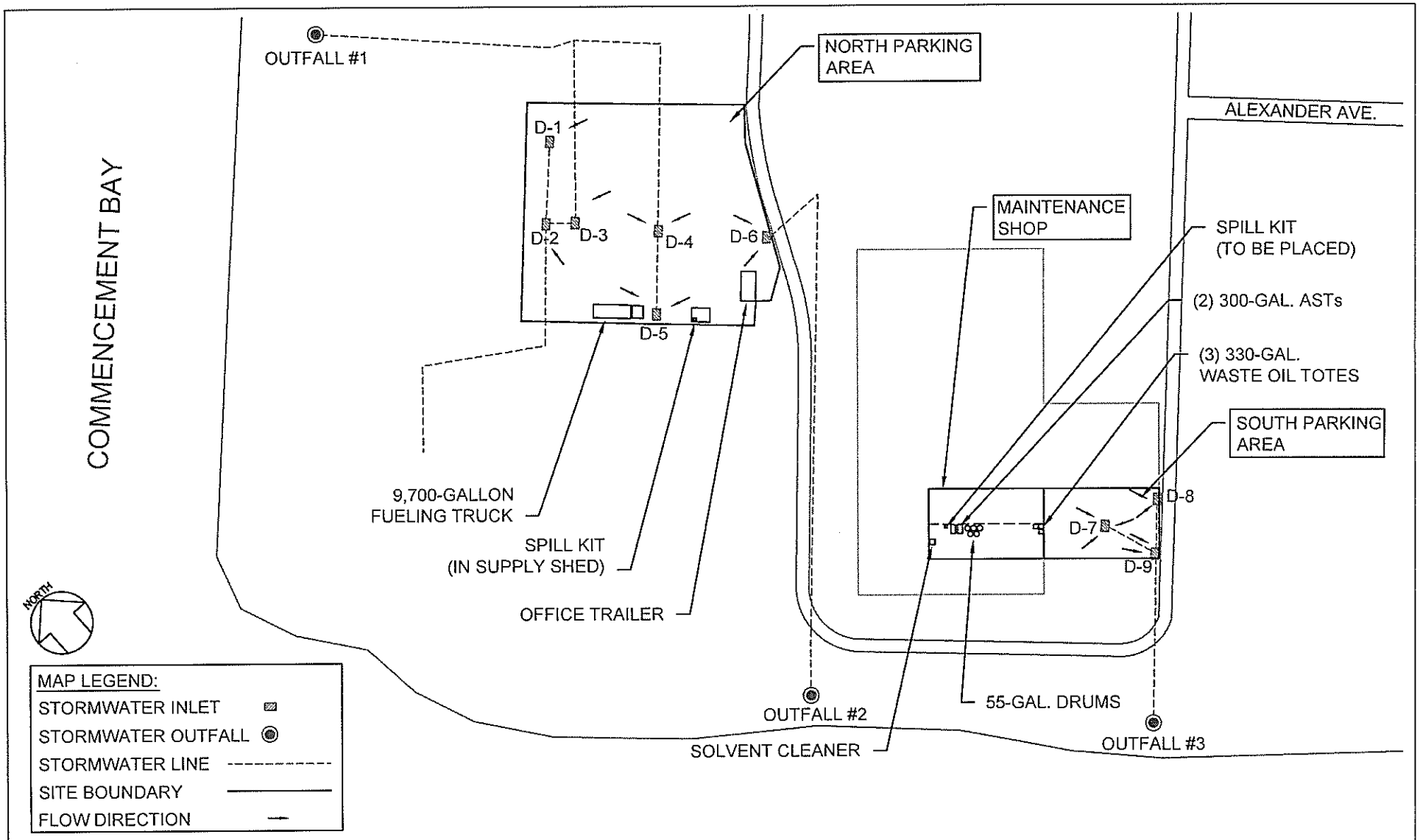
We held a closing conference with Mr. Nelson and Mr. Tran. We discussed the areas of concern identified during the inspection and I gave a brief overview of the post-inspection process. We thanked him for their time and assistance.

Mr. Nelson is the facility's official point of contact, but Mr. Tran also requested to be copied in post-inspection correspondence relevant to his new role as the facility's environmental consultant for ISGP compliance.

Report Completion Date: 6/7/2019

Lead Inspector Signature:

ATTACHMENT A – Site Map



psi Information To Build On Engineering • Consulting • Testing	APRIL 2016	SWPPP KAG WEST TACOMA, WASHINGTON	PSI PROJECT NUMBER 0704915
PSI, INC. 6032 N. CUTTER CIRCLE, SUITE 480 PORTLAND, OREGON 97217 (503) 289-1778	DRAWN BY: MWH	**SITE MAP**	

ATTACHMENT B – Photograph Log

Photographs were taken by Rachel Stephenson on March 28 and March 29, 2019 with a Panasonic DMC-FH25 camera

Photo 1 / P1040706 - Facing northwest, photo of the parking lot near the entrance to the maintenance shop (right of the blue dumpster). The area to the left of the blue dumpster is operated by a different business.

Photo 2 / P1040698 – Detail view of scrap metal in the open dumpster at the entrance to the maintenance shop. This is a cropped version of the original photo.

Photo 3 / P1040702 - Facing north, photo of barrels located near the entrance to the maintenance shop. The blue barrel contained fluid and was labeled as Windshield Wash.

Photo 4 / P1040703 – Detail view of the label on the blue barrel at the entrance to the maintenance shop.

Photo 5 / P1040747 - Facing southeast, photo of tanker trucks and the property line (yellow) in the north parking area.

Photo 6 / P1040718 - Facing northwest, photo of tanker trucks and stains on the pavement of the north parking area near the office trailer.

Photo 7 / P1040721 - Facing west, photo of the storm drain next to the supply sheds.

Photo 8 / P1040743 - Detail view of the location of a storm drain in the north parking area next to the office trailer.

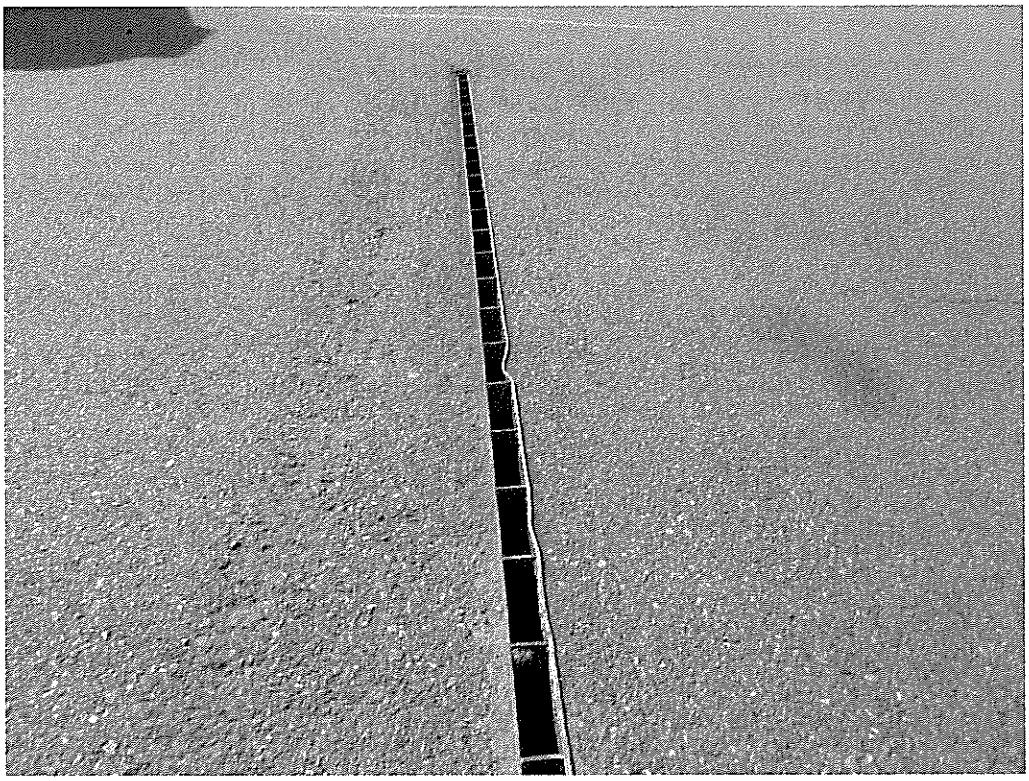


Photo 9 / P1040745 - Photo of a narrow drain in the north parking area.

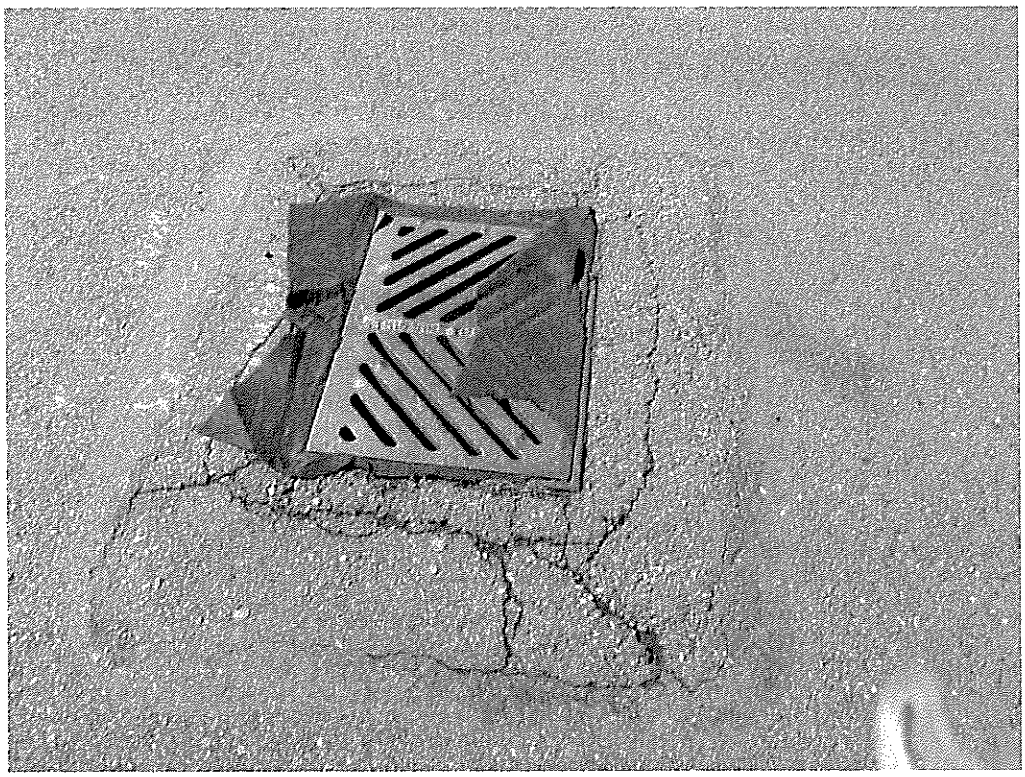


Photo 10 / P1040730 - Facing south, photo of one of the storm drains in the north parking area.

Photo 11 / P1040729 - Facing southwest, photo of a storm drain and tanker truck in the north parking area.

Photo 12 / P1040731 - Photo of stains underneath one of the tanker trucks.

Photo 13 / P1040755 - Facing northeast, photo of the refueling process.

Photo 14 / P1040756 - Facing east, photo of the refueling process. Close-up of fueling truck.

Photo 15 / P1040719 - Facing southwest, photo of an elevated tote.

Photo 16 / P1040751 - Facing southwest, photo of the secondary containment tray under the elevated tote.

Photo 17 / P1040753 - Facing south, photo of area next to the antifreeze containment bin.

Photo 18 / P1040749 - Facing southwest, photo of surface water barrier along the fenceline of a neighboring facility.

Complete list of photographs taken during the inspection:

- P1040695 - Facing southeast, photo of the parking lot near the maintenance shop.
- P1040696 - Facing north, photo of the entrance to the maintenance shop. Dumpster for scrap metal adjacent to entrance.
- P1040697 - Facing north, photo of the entrance to the maintenance shop. Dumpster for scrap metal adjacent to entrance.
- P1040698 - Facing north, photo of the dumpster for scrap metal. Note that the dumpster is uncovered.
- P1040699 - Facing north, photo of the dumpster for scrap metal. Note that the dumpster is uncovered.
- P1040700 - Facing east, photo of one of the storm drains located in the parking lot near the maintenance shop.
- P1040701 - Facing east, photo of one of the storm drains located in the parking lot near the maintenance shop.
- P1040702 - Facing north, photo of barrels located near the entrance to the maintenance shop. Note that all barrels were determined to be empty, other than the blue barrel labeled as Windshield Wash.
- P1040703 - Facing north, photo of barrels located near the entrance to the maintenance shop. Note that all barrels were determined to be empty, other than the blue barrel labeled as Windshield Wash. Close-up view of the blue barrel label.
- P1040704 - Facing north, photo of barrels located near the entrance to the maintenance shop. Note that all barrels were determined to be empty, other than the blue barrel labeled as Windshield Wash. Close-up view of the (empty) black barrel label (Ethylene Glycol).
- P1040705 - Facing east, photo of the dumpster for corrugated cardboard recycling. Note that the dumpster is uncovered.
- P1040706 - Facing northwest, photo of the parking lot near the entrance to the maintenance shop (one opening is to the right of the blue dumpster and the other opening is to the right of the white van). Note that the opening to the left of the dumpster is the entrance to a portion of the warehouse operated by a different business.
- P1040707 - Facing northwest, photo of the parking lot near the entrance to the maintenance shop. Close-up view of tire marks left on the pavement.
- P1040708 - Facing northwest, photo of the parking lot near the entrance to the maintenance shop (one opening is to the right of the blue dumpster and the other opening is to the right of the white van). Note that the opening to the left of the dumpster is the entrance to a portion of the warehouse operated by a different business.
- P1040709 - Facing west, photo of the north parking area and office trailer.
- P1040710 - Facing northwest, photo of the north parking area and tanker trucks.
- P1040711 - Facing northwest, photo of the north parking area and tanker trucks.
- P1040712 - Facing northeast, photo of one of the storm drains in the lot near the office trailer.
- P1040713 - Facing west, photo of the north parking area and tanker trucks.
- P1040714 - Facing east, photo of a paved area and separate warehouse (unaffiliated with KAG West).
- P1040715 - Facing east, photo of a paved area and separate warehouse (unaffiliated with KAG West).

- P1040716 - Facing north, photo of one of the storm drains in the lot near the office trailer.
- P1040717 - Facing north, photo of tanker trucks and stains on the pavement of the north parking area near the office trailer.
- P1040718 - Facing northwest, photo of tanker trucks and stains on the pavement of the north parking area near the office trailer.
- P1040719 - Facing southwest, photo of an elevated tote.
- P1040720 - Facing west, photo of storage sheds and one of the storm drains. The shed on the left contained flammable liquids; the shed on the right contained a spill clean-up and containment kit.
- P1040721 - Facing west, photo of the storm drain next to the supply sheds.
- P1040722 - Facing southeast, photo of the north parking area and tanker trucks near the office trailer.
- P1040723 - Facing south, photo of the north parking area, tanker trucks, and fueling truck near the office trailer.
- P1040724 - Photo of a wet area underneath one of the tanker trucks.
- P1040725 - Facing southeast, photo of one of the storm drains in the parking lot near Commencement Bay.
- P1040726 - Facing southeast, photo of one of the storm drains in the parking area near Commencement Bay.
- P1040727 - Facing east, photo of one of the storm drains in the north parking area.
- P1040728 - Facing east, photo of one of the storm drains in the north parking area.
- P1040729 - Facing southwest, photo of a storm drain and tanker truck in the north parking area.
- P1040730 - Facing south, photo of one of the storm drains in the north parking area.
- P1040731 - Photo of stains underneath one of the tanker trucks.
- P1040732 - Facing northeast, photo of one of the storm drains in the north parking area.
- P1040733 - Facing northeast, photo of one of the storm drains in the north parking area.
- P1040734 - Facing south, photo of tanker trucks and the property line (yellow) in the north parking area.
- P1040735 - Facing west, photo of tanker trucks and the property line (yellow) in the north parking area.
- P1040736 - Facing east, photo of various manholes in the neighboring parking area.
- P1040737 - Facing northeast, photo of one of the storm drains in the neighboring parking area.
- P1040738 - Facing northeast, photo of one of the storm drains in the neighboring parking area, near Commencement Bay.
- P1040739 - Facing northeast, photo of one of the storm drains in the neighboring parking area, near Commencement Bay.
- P1040740 - Facing northeast, photo of one of the storm drains in the neighboring parking area, near Commencement Bay.
- P1040741 - Facing west, photo of the land near the outfall location in Commencement Bay.
- P1040742 - Facing southwest, photo of one of the storm drains in the north parking area.

March 29, 2019:

- P1040743 - Detail view of the location of a storm drain in the north parking area next to the office trailer.
- P1040744 - Facing south, photo of the north parking area next to the office trailer.
- P1040745 - Photo of a narrow drain in the north parking area.
- P1040746 - Facing north, photo of the water and land near the outfall location in Commencement Bay.
- P1040747 - Facing southeast, photo of tanker trucks and the property line (yellow) in the parking lot.
- P1040748 - Facing southwest, photo of a surface water barrier along the fenceline of a neighboring facility.
- P1040749 - Facing southwest, photo of surface water barrier along the fenceline of a neighboring facility.
- P1040750 - Facing southwest, photo of the secondary containment tray under the elevated tote.
- P1040751 - Facing southwest, photo of the secondary containment tray under the elevated tote.
- P1040752 - Facing west, photo of a secondary containment tray.
- P1040753 - Facing south, photo of area next to the antifreeze containment bin.
- P1040754 - Facing southeast, photo of the antifreeze containment bin.
- P1040755 - Facing northeast, photo of the refueling process.
- P1040756 - Facing east, photo of the refueling process. Close-up of fueling truck.
- P1040757 - Facing west, photo of tires accumulated near the elevated tote.