UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

MAR 2 4 2009

Via Overnight Delivery
In Reply Refer To: CWA-309(a)-09-014

Mr. Fred Anawati
President
Marisco, Ltd.
91-607 Malakole Road
Kapolei, Oahu, Hawaii 96707

Subject: Issuance of Findings of Violation and Order for Compliance for NPDES Permit Violations

Dear Mr. Anawati:

On December 9, 2008, under the authority of the Clean Water Act (CWA), an EPA-authorized inspector and a representative of the Hawaii Department of Health (DOH) conducted a compliance inspection of Marisco Ltd.'s (Marisco's) Lil' Perris drydock and main facilities to determine Marisco's compliance with NPDES Permit No. HI0021786 and the CWA.

The inspection revealed violations at both facilities. Given the number and nature of violations at issue and EPAs prior enforcement actions against Marisco, an Order for Compliance is needed to ensure that Marisco promptly and fully complies with all applicable NPDES permit requirements.

Therefore, enclosed please find our Findings of Violation and an Order for Compliance pursuant to Sections 308(a) and 309(a)(3), (a)(4), and (a)(5)(A) of the CWA, as amended [33 U.S.C. Sections 1318(a), and 1319(a)(3), (a)(4), (a)(5)(A)] for Marisco's violations of NPDES permit conditions and the CWA at its Kapolei drydock and vessel repair operations.

The table below summarizes some of the key activities and due dates included in the Order:

KEY DATES	ADMINISTRATIVE ORDER CWA-309(a)-09-014
IMMEDIATELY	1. Cease all unpermitted discharges. 2. Fully implement and comply with the January BMP Plan and SWPPP 3. Make corrections to certain violations identified in the inspection report.
04/15/09	4. Complete additional corrections to other violations identified in the inspection report. 5. Provide training to all employees, contractors and subcontractors performing work onsite.
04/30/09	6. Submit interim compliance reports 7. Submit revised Main Facility Revised SWPPP
06/01/09	8. Submit certain other information

The enclosed Order and the findings that constitute the basis behind the Order are issued pursuant to Sections 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Clean Water Act ("the Act") as amended [33 U.S.C. Sections 1318(a) and 1319(a)(3), (a)(4) and (a)(5)(A)]. Any violation of the terms of this Order or discharge standards could subject Marisco to a civil action for appropriate relief pursuant to Section 309(b) of the Act [33 U.S.C. Section 1319(b)] and/or penalties under Section 309(d) of the Act [33 U.S.C. Section 1319(d)] of up to $31,500 per day of violation. In addition, under Section 309(g) of the Act [33 U.S.C. Section 1319(g)], any violation of the discharge standards could also subject Marisco to an administrative penalty action of up to $16,000 per day of violation not to exceed $177,500. Sections 309(c)(1), (c)(2) and (c)(4) of the Act [33 U.S.C. Section 1319(c)(1), (c)(2) and (c)(4)] also provide criminal penalties for negligent violations, knowing violations and knowingly making false statements.

The request for information included in this Order is not subject to review by the Office of Management and Budget (OMB) under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. Sections 3502(4), 3502(11), 3507, 3512, and 3518. Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons [44 U.S.C. Section 3502(4), 3502(11) and 5 CFR Section 1320.5(a)].

EPA has promulgated regulations to protect the confidentiality of the business information it receives. These regulations are set forth in 40 CFR Part 2, Subpart B and in the Federal Register at 41 F.R. 36902 (September 1, 1976) and 43 F.R. 40000 (September 8, 1978). A claim of business confidentiality may be asserted in the manner specified by 40 CFR Section 2.203(b) for part or all of the information requested. EPA will disclose business information covered by such a claim only as authorized under 40 CFR Part 2, Subpart B. If no claim accompanies the business information at the time EPA receives it, EPA may make it available to the public without further notice. Marisco may not withhold from EPA any information on the grounds that it is confidential.

If you have any questions, please contact Mr. Jeremy Johnstone of my staff at 415-972-3499 or at johnstone.jeremy@epa.gov.

Sincerely,

Alexis Strauss 24 March 2009
Alexis Strauss
Director, Water Division

Enclosure

cc (w/enclosures):
Alec Wong, DOH

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 9

In the Matter of	)	
	)	
Marisco, Ltd.	)	FINDINGS OF VIOLATION
91-607 Malekole Road	)	
Kapolei, Hawaii	)	AND
	)	
Proceedings under Section 308(a) and 309(a)(3),	)	ORDER FOR COMPLAINCE
(a)(4) and (a)(5)(A) of the Clean Water Act, as	)	
amended, 33 U.S.C. Section 1318(a) and	)	Docket No. CWA-309(a)-09-014
1319(a)(3), (a)(4) and (a)(5)(A)	)	

STATUTORY AUTHORITY

The following Findings of Violation and Order is issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency (EPA) pursuant to Sections 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Clean Water Act [33 U.S.C. Sections 1318(a) and 1319(a)(3), (a)(4) and (a)(5)(A)] (hereinafter the Act). This authority has been delegated by the Administrator and the Regional Administrator of EPA Region 9 to the Director of the Water Division of EPA Region 9.

FINDINGS OF VIOLATION

The Director of the Water Division of EPA Region 9 finds that Marisco, Ltd. ("Marisco"), violated NPDES Permit No. HI0021786 and Sections 301(a) and 308 of the Act [33 U.S.C. Section 1311(a) and 1318]. This Finding is made on the basis of the following facts:

Background

1. Section 301(a) of the Act [33 U.S.C. Section 1311(a)] prohibits the discharge of any pollutant by any person from a point source into waters of the United States except in

compliance with, inter alia, a National Pollutant Discharge Elimination System (NPDES) permit issued in accordance with Section 402(a) of the Act [33 U.S.C. Section 1342].

2. Section 502(5) of the Act [33 U.S.C. Section 1362(5)] defines "person" to mean an individual, corporation, partnership, association, State, municipality, commission, or political subdivision of a State, or any interstate body.

3. Section 502(6) of the Act [33 U.S.C. Section 1362(6)] defines "pollutant" to mean sewage, garbage, sewage sludge, rock, sand, chemical wastes, biological materials, dredged spoil, solid waste, incinerator residue, munitions, radioactive materials, heat, wrecked or discarded equipment, cellar dirt, and industrial, municipal, and agricultural waste discharged into water.

4. Section 502(12) of the Act [33 U.S.C. Section 1362(12)] defines the term "discharge of pollutants" to mean any addition of any pollutant to navigable waters from any point source.

5. Section 502(7) of the Act [33 U.S.C. Section 1362(7)] defines the term "navigable waters" to mean the waters of the United States, including the territorial seas.

6. Section 502(14) of the Act [33 U.S.C. Section 1362(14)] defines "point source" to mean any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel, or other floating craft, from which pollutants are or may be discharged.

7. Section 402(p) of the Act [33 U.S.C. § 1342(p)] sets out specific requirements for the issuance of NPDES permits for the discharge of storm water. Section 402(p)(2)(B)

requires permits to be issued for discharges of storm water associated with industrial activities [33 U.S.C. § 1342(p)(2)(B)].

8. On 16 November 1990, EPA promulgated regulations at 40 C.F.R. Part 122.26, implementing Section 308 and the storm water permit provisions of Section 402(p) of the Act [33 U.S.C. § 1342(p)].

9. 40 C.F.R. §122.26(c) provides that dischargers of storm water associated with industrial activity are required to apply for an individual permit, apply for a permit through a group application, or seek coverage under a promulgated storm water general permit. 40 C.F.R. §122.21(a) *Duty to apply* requires that any person who discharges or intends to discharge pollutants must apply for an NPDES permit unless exempt.

10. 40 C.F.R. §122.26(b)(14) sets out the definition of "storm water discharge associated with industrial activities" and, at 40 C.F.R. §122.26(b)(14)(ii) includes Ship Building and Repair establishments, SIC 3731.

11. Section 402(b) of the Act [33 U.S.C. Section 1342(b)] authorizes states to administer the NPDES program, with approval of the Administrator of EPA. The State of Hawaii, through its Department of Health (DOH), is a state approved under section 402(b) of the Act to administer the NPDES program, including the issuance of storm water permits.

12. On October 25, 2002, DOH adopted, among other things, the NPDES General Permit Authorizing Discharges of Storm Water Associated with Industrial Activities, HAR Chapter 11-55 Appendix B (the Hawaii Industrial Activities General Permit). This general permit became effective on November 7, 2002. It expired on October 21, 2007, when the Hawaii Industrial Activities General Permit was subsequently readopted by

DOH with an effective date of October 22, 2007. The current general permit is set to expire on October 21, 2012.

Marisco

13. Marisco is a company registered to do business in the State of Hawaii, and is therefore a person within the meaning of Section 502(5) of the Act [33 U.S.C. Section 1362(5)], and thus subject to the provisions of the Act, [33 U.S.C. Section 1251 et seq].

14. Marisco is the owner and operator of 1) a ship repair facility located at Pier 3 of Kalaeloa Barbers Point Harbor on the Island of Oahu (the Main Facility) and 2) a drydock and an associated onshore support facility at the north east portion of Kalaeloa Barbers Point Harbor west of and across from Pier 7 (the "Lil' Perris" drydock facility).

15. Marisco discharges stormwater and industrial wastewater from each of these facilities to Kalaeloa Barbers Point Harbor. The stormwater and industrial wastewater discharges contain, among other things, copper, zinc, and suspended solids, all of which are pollutants as defined at Section 502(6) of the Act [33 U.S.C. Section 1362(6)], and the regulations at 40 C.F.R. §122.2.

16. The two Marisco facilities are each "point sources" as defined by Section 502(14) of the Act [33 U.S.C. Section 1362(14)], and the regulations at 40 C.F.R. §122.2.

17. The two Marisco facilities are each categorized under Standard Industrial Classification (SIC) 3731, Ship Building and Repairing. As such they are also each engaged in "industrial activities" as defined at 40 C.F.R. §122.26(b)(14)(ii).

18. Kalaeloa Barbers Point Harbor is a "navigable water" as defined at Section 502(7) of the

Act [33 U.S.C. Section 1362(7)], and a "water of the United States" as defined at the regulations at 40 C.F.R. §122.2.

19. DOH has established water quality standards for the waters of Kalaeloa Barbers Point Harbor, Hawaii Administrative Rules ("HAR") Chapter 11-54. These standards include those established for Copper (Total Recoverable) and Zinc (Total Recoverable), in the amounts of 2.9 micrograms per liter ("ug/l") and 95 ug/l, respectively. HAR § 11-54-4(b)(3).

Marisco's Lil' Perris Drydock Facility and Onshore Support Area

20. On February 9, 2007 DOH issued NPDES Permit No. HI 0021786 ("Permit") to Respondent, effective March 11, 2007 and set to expire on March 31, 2009. The Permit authorizes 1) the discharge of harbor water flowing from the Drydock Lil' Perris during a lowering and lifting cycle and 2) storm water runoff from both the drydock and its onshore support area, in compliance with effluent limitations, monitoring requirements and other conditions and requirements stated in the permit and in the attached DOH "Standard NPDES Permit Conditions," dated December 30, 2005. The Permit further established, among other things, the following requirements:

a. Part A.1.a establishes effluent limitations and monitoring requirements for harbor water flowing off of the drydock during each lowering and lifting cycle through Outfall Serial Nos. 001 and 002. A listing of select effluent limitations and monitoring requirements are attached at Exhibit 1, which is hereby made a part of these Findings of Violation and Order;

b. Part A.2.a establishes effluent limitations and monitoring requirements for storm

water runoff associated with industrial activity through Outfall Serial Nos. 003 and 004;

c. Part A.4 requires the Discharger to use test methods promulgated in 40 C.F.R. Part 136;

d. Parts B.2.a through B.2.i establish pollution prevention measures required to be implemented by the Discharger;

e. Part B.4.a requires the Discharger to maintain monthly logs of all dry dock cycling activities;

f. Part B.4.b requires the Discharger to maintain daily logs documenting all the sand blasting activities conducted at the Facility and submit a summary of each month's logs with the monthly monitoring reports;

g. Part B.4.e of NPDES Permit No. HI0021786 requires the Discharger to maintain on-site rain gage records and submit a summary of the logs with the monthly monitoring reports;

h. Part B.5 requires the Discharger to develop and implement a Best Management Practices (BMP) Plan to reduce pollutants discharged from the Facility, and update the BMP Plan as needed;

i. Part B.5.a of NPDES Permit No. HI0021786 requires the Discharger to review and update the BMPs Plan as needed when changes are made at the Facility, within 30-days from the date that such changes were made. Further, the Discharger must maintain documentation of all changes made to the plan;

j. Part C.1.d of NPDES Permit No HI0021786 requires the Discharger to submit monitoring reports (or have them postmarked), no later than the 28th day of the month following the completed reporting period, to the EPA and DOH; and

k. Standard Provision 3.c requires the Discharger to periodically calibrate all monitoring and analytical equipment in order to ensure the accuracy of measurements at 6 month intervals or the manufacturer's recommended intervals.

l. Standard Provision 14.b requires the Discharger to retain all monitoring information, including all calibration and maintenance records, for a minimum of five (5) years from the date of the sample, measurement or report.

21. Required self-monitoring reports for January through November 2008 were not submitted to DOH until January 29, 2009, in violation of Part C.1.d of the permit.

22. Required self-monitoring reports for January through November 2008 were not submitted to EPA in violation of Part C.1.d of the permit.

23. Required self-monitoring reports submitted to DOH by the respondent pursuant to the permit demonstrate that, at least since March 2007 (the effective date of the permit) Marisco has exceeded its established effluent limitations for both copper and zinc on numerous occasions. A listing of these reported exceedances are attached at Exhibit 1, which is hereby included as part of these Findings.

24. On December 9, 2008 an EPA contractor and a DOH inspector together inspected the Lil' Perris drydock facility for compliance with the terms and conditions of NPDES Permit

No. HI0021786. A copy of the report of that inspection (Inspection report) is attached as Exhibit 2 and included herein by reference. Among other things, the inspection report demonstrates:

a. Marisco violated Part A.2.a and Standard Provision 14.b of the permit in that the Facility representative (the Health, Safety, and EPA Compliance Officer) was unable to provide a recent storm water monitoring report;

b. Marisco violated Part A.4 and Standard Provision 14.b of the permit in that the Facility representative reported that all effluent samples for the harbor water running off the dry dock are taken using a plastic scoop and a plastic bucket, prior to distributing the effluent into the appropriate sample containers issued by the contract laboratory. 40 C.F.R. Part 136 requires that all samples for oil and grease be taken directly into a glass container. The monitoring method described by the Facility representative for sampling oil and grease does not meet the requirements of 40 C.F.R. Part 136 or therefore, Part A.4 of the permit;

c. Marisco violated Part B.4.b and Standard Provision 14.b of the permit in that the Facility representative was unable to provide a log documenting sand blasting activities at the Facility;

d. Marisco violated Part B.4.e and Standard Provision 14.b of the permit in that the Facility representative was unable to provide records of rainfall at the Facility, nor was a rain gage available for observation on the date of the inspection;

e. Marisco violated Part B.5.a of the permit in that the most recent BMP Plan available for review on the date of the inspection was last revised in October 2002. The BMP Plan did not appear to have been updated during the term of the current permit and did not accurately reflect current Facility site conditions;

f. Marisco violated Standard Condition 3.c in that the pH buffer (4.0) available on-site to conduct the calibrations of the pH meter had an expiration date of October 2004;

g. Marisco violated Standard Condition 14.b in that:

i. Calibration records for the pH meter used by the Discharger to demonstrate compliance with the effluent limitations contained in the NPDES Permit were not available for review;

ii. It was observed in the dry dock cycling log that a cycling event occurred on August 22, 2008. Part.A.1.a requires Marisco to conduct monitoring during each dry dock cycle. Marisco's dock cycling log indicates that monitoring occurred at the time of the cycling, however a copy of the analytical data for this monitoring event was not available for review on the date of the inspection; and

iii. a chain-of-custody for a reported June 2, 2008 monitoring event was not available for review on the date of the inspection.

h. Marisco violated B.2 and B.5.a in that the following conditions observed during

the inspection at the dry dock and shore side of the dry dock, were not in compliance with the proper implementation of BMPs as specified in either Part B of permit and/or the Discharger's BMP Plan (dated October 2002):

i. Two 55-gallon drums of used oil were observed stored without secondary containment on the shore side staging area beside the dry dock, inconsistent with Part B.2.j of the permit which states, "The Permittee shall maintain land-based operations in a clean and orderly manner and implement measures to prevent pollutants from contacting storm water runoff." Further, this condition is not consistent with land-based operation BMPs of the Discharger's BMP Plan (p. 8), which states that spill pallets will be on-site and used;

ii. A mixture of oil and condensate was observed dripping directly on the ground from an air compressor on the shore side staging area beside the dry dock, inconsistent with Part B.2.j of the permit;

iii. Sand blasting grit was observed spilled on the ground, shore side of the dry dock and multiple bags of fresh sand blasting grit were observed stored on-site without cover, inconsistent with Part B.2.j of the permit and with the land-based operation BMPs of the Marisco's BMP Plan, which states that sand blast grit [new or spent] will be covered; and

iv. The dry dock does not have any structural BMPs, such as berming, to contain potential discharges from washing/cleaning activities, inconsistent

with Marisco's BMP Plan. That Plan states (pp. 4 and 5) that, under low pressure/low volume cleaning and under ultra-high pressure water blasting, a 4" inch berm is on the forward and aft ends of the dry dock to contain any liquids generated on-site. The Facility representative indicated that the a former 4" berm was removed and further stated that temporary berms or containment BMPs are not set up on the dry dock.

25. EPA's NPDES regulations provide, at 40 C.F.R. §122.6(a), that an expiring EPA-issued NPDES permit may be administratively continued pending permit reissuance only if a complete and timely application for renewal of an expiring NPDES permit is made and, through no fault of the permittee, the new permit does not issue before the expiration date. In an NPDES-authorized State, an expiring NPDES permit may be continued if state law allows [40 C.F.R. §122.6(d)]. In Hawaii, State law [Hawaii Administrative Rules Section 11-55-27(a)] specifies that in order to receive such a continuation, an application for renewal of an expiring NPDES permit must be made at least one hundred eighty (180) days prior to the permit's expiration.

26. In order to have made a timely application for renewal of its expiring NPDES permit and to be eligible for a continuation of that permit, Marisco was to have submitted its complete application by October 2, 2008. Marisco submitted the application for renewal of the NPDES late, on January 29, 2009. Therefore, NPDES Permit No. HI0021780 therefore will not be administratively continued pending reissuance.

27. Marisco's permit renewal application included, among other things, a document entitled "Environmental Best Management Practices" for the Lil' Perris Facility, Revised January

2009" (Lil' Perris Revised BMP Plan).

28. Upon expiration of the permit on March 31, 2009 and until such time that DOH re-issues Marisco a valid NPDES permit authorizing 1) the discharge of harbor water flowing from the Drydock Lil' Perris during a lowering and lifting cycle and 2) the discharge of storm water runoff from the drydock and adjacent land area, Marisco will be discharging without a valid permit each time it cycles the drydock and with every rain event that produces stormwater discharge into Kalaeloa Barbers Point Harbor.

Marisco's Main Facility

29. DOH previously issued NPDES Permit No. HI0021199 authorizing certain discharges from Marisco's Main Facility. This permit was last issued on March 10, 2000, effective on April 10, 2000, and it expired on March 31, 2004. On March 16, 2004 the permit was administratively continued pending permit reissuance. The permit was terminated by DOH on March 31, 2006.

30. On March 24, 2006 Marisco filed for coverage under the Hawaii Industrial Activities General Permit by submitting a complete Notice of Intent. DOH provided Marisco with a Notice of General Permit Coverage (NGPC) on March 31, 2006 and assigned ID No. HIR20C504 to Marisco for its Main Facility.

31. NGPC No. HIR20C504 expired on October 22, 2007. Despite receiving notice from DOH regarding procedures for reapplication, Marisco did not reapply for coverage.

32. The 2002 BMP plan for NPDES HI0021786 does not extend to, include, or apply to Marisco's Main Facility.

33. Rainfall events in the amount of 0.1 inches or more are able to produce stormwater runoff

from Marisco's Main Facility. Rain data available from the National Weather Service's weather station at Campbell Industrial Park, located in close proximity to Marisco's Main Facility, indicates that it rained in the amount of 0.1 inches or more on at least 31 occasions between October 23, 2007 and December 31, 2008. A table summarizing this data is attached as Exhibit 3. Discharges of stormwater from Marisco's Main Facility since October 23, 2007 were made without authorization under the CWA.

34. On January 29, 2009 Marisco submitted to DOH an application for renewal of NPDES Permit No. HI0021786. Marisco's permit renewal application included, among other things, a "Storm Water Pollution Prevention Plan, Marisco Main Facility; Revised January 2009" (Main Facility Revised SWPPP). Marisco requested that stormwater discharges from the Main facility be permitted under the subject individual NPDES permit rather than, as previously under, the Hawaii Industrial Activities General Permit.

35. The December 9, 2008 compliance inspection by EPA's contract and DOH inspectors included a review of practices and conditions at Marisco's Main Facility. Among other things, the inspectors observed the following conditions which indicate the potential for contaminated, unpermitted discharges:

a. Berms around the main yard, a portion of Marisco's Main Facility referred to as "JR's area", and the storage area behind the main yard were observed to have breaches, discharge structures, or areas that lacked containment, resulting in potential storm water discharge locations;

b. Due to the lack of sufficient berming, and the potential for storm water discharges, several areas were noted that require secondary containment or overhead coverage;

c. The Discharger had recently concreted portions of the main yard, JR's area, and the storage area behind (northeast of) the metal working building. The inspectors noted that concrete had not been properly contained, including in some cases overflowing into the receiving water;

d. Two workers were observed mixing cement on the work barge. Wet cement was observed on the ground of the work barge. Runoff from the cement mixing was observed running under the wall and down the side of the work barge into the receiving water;

e. A sink was observed on the stern of the work barge. The Facility representative stated that the sink was used for washing hands and cleaning fish and that he believed that the sink discharges directly into the harbor below; and

f. A worker was observed hosing down the northwest work area of the Facility and the associated washwater was observed discharging offsite into receiving waters.

Conclusion

36. Based upon the foregoing, I find that Marisco has violated NPDES No. HI0012786 and Sections 301(a) and 308 of the Act.

ADMINISTRATIVE ORDER

Taking the above Findings into consideration and considering the potential environmental and human health effects of the violations and all good faith efforts to comply, EPA has determined that compliance in accordance with the following requirements is reasonable. Pursuant to Section 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Act, 33 U.S.C. Section 1318(a) and 1319(a)(3), (a)(4) and (a)(5)(A), IT IS HEREBY ORDERED that Marisco comply with the following requirements:

Lil' Perris Drydock and onshore support area

1. EFFECTIVE IMMEDIATELY, Marisco shall henceforth fully implement the Sandblast Grit Tracking Program, Revised January 2009, included as Appendix C to the Lil' Perris Revised BMP Plan.
2. EFFECTIVE IMMEDIATELY, Marisco shall install a rain gauge, record onsite precipitation amounts on a daily basis, and report a summary of the logs with monthly DMRs.
3. EFFECTIVE IMMEDIATELY, Marisco shall henceforth collect all samples to be analyzed for Oil and Grease pursuant to Part A.1.a of the permit directly in clean glass containers, without transfer into any secondary container.
4. EFFECTIVE IMMEDIATELY, Marisco shall henceforth properly calibrate its pH meter immediately prior to each compliance sampling to include analysis for pH, and shall maintain records of all such pH meter calibration events.
5. Commencing on APRIL 1, 2009 Marisco shall fully comply with all terms and conditions of expiring NPDES Permit No. HI0021786 until such time that a reissued permit, or new

permit, goes into effect. Additionally, Marisco shall also comply with the following:

a. Except as noted below, immediately and fully comply with the Lil' Perris Revised BMP Plan.

b. Prior to working on any vessel install the permanent berm referenced at BMP 2 "Low-Pressure Wash Water"

c. Marisco shall promptly make any changes to the Lil' Perris Revised BMP Plan requested by either EPA or DOH, and shall promptly implement any such changes.

6. By APRIL 15, 2009 Marisco shall correct all of the BMP deficiencies described at Major Finding 13 of the inspection report.

7. By APRIL 15, 2009 Marisco shall repair all berms, curbs and dikes at its onshore support area such that there can be no uncontrolled discharges from this area to Kalaeloa Barbers Point Harbor.

8. By APRIL 15, 2009 provide training on the Lil' Perris Revised BMP Plan to all employees and contractors, subcontractors performing work at the Lil' Perris Drydock and onshore support area. Provide training to any new employees, contractors, subcontractors prior to their performing any other work activities.

9. By APRIL 30, 2009, Marisco shall submit a report describing both the activities taken pursuant to and certifying compliance with Items 1-8 immediately above.

10. Marisco is prohibited from performing pressure washing at greater than 4000 psi unless and until a BMP for this activity is submitted to and approved by DOH.

Main Facility

11. EFFECTIVE IMMEDIATELY Marisco shall cease all discharges except for uncontaminated stormwater runoff.

12. Except as noted below, Marisco shall IMMEDIATELY and fully comply with the Main Facility Revised SWPPP.

13. WITHIN 24 HOURS OF RECEIPT OF THIS ORDER Marisco shall photograph the valving installed to control discharges from the valved openings in the berms at potential outfalls 001 and 002 as described at Section 4 of the Main Facility Revised SWPPP.

14. By APRIL 15, 2009 Marisco shall submit copies of the photographs taken pursuant to Item 13 immediately above, along with documentation as to date and time that the photographs were taken.

15. By APRIL 15, 2009 Marisco shall properly clean the deck of the support work barge of rust chips/dust that has a potential to discharge into Kalaeloa Barbers Point Harbor, as noted in the Inspection report, photo 40.

16. By APRIL 15, 2009 Marisco shall correct all of the deficiencies described at Major Finding 14 of the inspection report.

17. By APRIL 15, 2009 Marisco shall remove from the Facility, and properly dispose of, all waste paints, waste solvents, waste petroleum products, other liquid wastes, surplus metals and equipment.

18. By APRIL 15, 2009 Marisco shall develop and implement BMPs for areas of activity on the support work barge that are not wholly under impervious cover.

19. By APRIL 15, 2009 Marisco shall provide training on the Main Facility Revised SWPPP

to all employees and contractors, subcontractors performing work at the Main Facility. Marisco shall additionally provide training to any new employees, contractors, and subcontractors prior to their performing any work activities.

20. By APRIL 30, 2009, Marisco shall submit a report describing both the activities taken pursuant to and certifying compliance with Items 11-19 immediately above.

21. By APRIL 30, 2009 Marisco shall submit a revised Main Facility Revised SWPPP that 1) includes a description of pollutant sources, activities, and BMPs for uncovered areas of the work barge; 2) correctly describes all locations of potential stormwater discharge (i.e. outfalls) and correctly identifies each of these on the document's attached "Site Drainage Plan and Outfalls" diagram; and 3) includes a plan for stormwater sampling at each applicable discharge location. Marisco shall promptly make any changes to the Main Facility Revised SWPPP requested by either EPA or DOH, and shall promptly implement any such changes.

Submission of Information

22. By JUNE 1, 2009 Marisco shall provide the following information:

a. Copies of any/all Chain of Custody forms completed for and analytical reports received from Marisco's contract laboratory for sampling of harbor water discharge associated with drydock cycling January 1, 2005 through March 31, 2009 under either NPDES Permit No. HI0021786 or HI0021199;

b. Copies of any/all Chain of Custody forms completed for and analytical reports received from Marisco's contract laboratory for ambient sampling conducted from January 1, 2005 through March 31, 2009 under either NPDES Permit No.

HI0021786 or HI0021199;

c. Copies of any/all Chain of Custody forms completed for and analytical reports received from Marisco's contract laboratory for stormwater discharge sampling conducted from January 1, 2005 through March 31, 2009 under either NPDES Permit No. HI0021786 or HI0021199;

d. Copies of any/all BMP plans or equivalent in effect from January 1, 2005 through March 31, 2009 for both the Main Facility and the Lil' Perris Drydock and its onshore support area;

e. Copies of any/all laboratory reports from sampling of either low-pressure/low-volume cleaning and/or ultra-high pressure water blasting performed at Lil' Perris from January 1, 2005 through March 31, 2009;

f. Copies of any/all shipping/disposal manifests associated with the off-site shipment and ultimate disposal of either low-pressure/low-volume cleaning and/or ultra-high pressure water blasting performed at Lil' Perris from January 1, 2005 through March 31, 2009;

g. A record of all dates from January 1, 2005 forward on which Marisco performed either low-pressure/low-volume cleaning and/or ultra-high pressure water blasting performed at Lil' Perris;

h. Copies of any/all records of trainings under any of the BMP plans or equivalent in effect at the time, provided from January 1, 2005 through March 31, 2009 to Marisco employees, contractors, and/or subcontractors for both the Main Facility and the Lil' Perris Drydock and its onshore support area; and

i. A listing of all employees of Marisco from January 1, 2005 forward. The submitted listing shall include each employee's full name, dates worked at Marisco, and job title(s) while employed at Marisco.

23. For each Item 1-20 above, provide Marisco's cost of compliance. The submitted cost information shall include for each item:

i. Reference to the applicable Compliance Order Item No.;

ii. A description of the compliance action(s) taken;

iii. The cost of implementing the compliance action(s), disaggregated by capital costs, non-depreciable one-time expenses, and annually recurring costs (e.g. O&M). For each reported cost indicate if the amount is based upon actual expenditures or are derived from estimates.

23. All reports submitted pursuant to this Order must be signed by a principal executive officer, ranking elected official, or duly authorized representative of Marisco [as specified by 40 CFR § 122.22 (b)(2)] and shall include the following statement:

> "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 persons directly responsible for gathering the information, I certify that 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."

24. All submittals shall be mailed to the following addresses:

U.S. ENVIRONMENTAL PROTECTION AGENCY
75 Hawthorne Street
San Francisco, California 94105
Attn: Jeremy Johnstone (WTR-7)

and

HAWAII DEPARTMENT OF HEALTH
Clean Water Branch
P.O. Box 3378
Honolulu, Hawaii 96801-3378
Attn: Mike Tsuji

25. This Order is not and shall not be interpreted to be an NPDES permit under Section 402 of the Act [33 U.S.C. Section 1342], nor shall it in any way relieve Marisco of obligations imposed by the Act, or any other Federal, State or local law.

26. The State of Hawaii has been notified of this action.

27. This Order takes effect upon signature.

Alexis Strauss
Director, Water Division

24 March 2009
Dated

Exhibit 1
Marisco, Ltd.
NPDES Permit No. HI0021786
Drydock Cycling Effluent Limitation Violations
April 2007 – November 2008

Date	Copper Limit = 2.9 ug/l Daily Max.	Zinc Limit = 95 ug/l Daily Max.
Apr 2007	43	210
May 2007	110	150
Jun 2007	-	100
Aug 2007	140	250
Jan 2008	450	310
Feb 2008	83	100
Apr 2008	590	410
May 2008	1300	510
Jun 2008	790	310
Aug 2008	630	390
Nov 2008	390	260

Exhibit 2

EPA Region IX and Hawaii Department of Health

NPDES Compliance Evaluation Inspection (CEI) Report

Name and Location of Facility Inspected Marisco, LTD. 91-607 Malakole Road Kapolei, HI 96707	**Entry Date** 12/9/2009 **Entry Time** 9:00 AM	**Permit Effective Date** 3/11/2007
NPDES Permit Number HI0021788	☐ **Major** ☒ **Minor**	**Permit Expiration Date** 3/31/2009
Name(s) & Title(s) of On-Site Representative(s) Bill McCaffery (Health, Safety, and EPA Complaince Officer) Fred Anawati (President)	**Contact Information** Phone: (808) 564-0730	**Notified of Inspection?** ☐ **Yes** ☒ **No**
Name, Title & Address of Responsible Official Fred Anawati (President)	**Contact Information** Phone: (808) 682-1333	**Official Contacted?** ☒ **Yes** ☐ **No**
Inspector(s) **Primary:** Dan Connally (PG Environmental, LLC) **Other(s):** Matt Kurano (HI DOH)		**Presented Credentials?** ☒ **Yes** ☐ **No**
Weather Conditions at the Time of the Inspection: Sunny; no recent precipitation	**Facility Receiving Water Name:** Barbers Point Harbor	
Prepared By: Dan Connally (PG Environmental, LLC) on December 9, 2008 Reviewed By: Scott Coulson (PG Environmental, LLC) on January 29, 2009		

On December 9, 2008, as part of a municipal separate storm sewer system (MS4) compliance audit of the Hawaii Department of Transportation, Harbors Division, a USEPA contractor inspected Marisco, LTD. in Kapolei Hawaii (in Barbers Point Deep Draft Harbor, located on Pier P-3, and across from Pier P-7). Discharges from Marisco, LTD. are regulated by NPDES Permit No. HI0021786. The primary purposes of the inspection were to (1) assess the adequacy, appropriateness, and maintenance of best management practices (BMPs) employed by Marisco, LTD (a Harbors Division tenant), and (2) determine the accuracy and reliability of the Marisco, LTD's self-monitoring and reporting program. The primary on-site representative was Bill McCaffery (Health, Safety, and EPA Compliance Officer). The weather at the time of inspection was sunny, with no sign of recent precipitation.

Introduction

Marisco, LTD. (Facility or Discharger) repairs and maintains ships at its Facility located in Barbers Point Harbor. The Facility conducts industrial activities throughout two portions of the shoreline around Barbers Point Harbor, including dockside at Pier P-3 and on a dry dock and storage area across from Pier P-7.

Facility Description

The Facility is separated into two main locations. The portion of the Facility located on Pier P-3 includes an office building, enclosed work areas (welding, sandblasting, painting, pipe shop, and machine shop), materials storage areas, a main yard with heavy equipment, and a work barge (a barge on which materials are stored and is used by the Facility staff as a staging area for work on boats docked at the Facility). The area located across from Pier P-7 is where the dry dock, Lil Pemis, is located. The dry dock portion of the Facility includes a storage/staging area and the dry dock itself.

Figure 1 provides an overview map of the Barbers Point Harbor and the two Marisco, LTD operations.

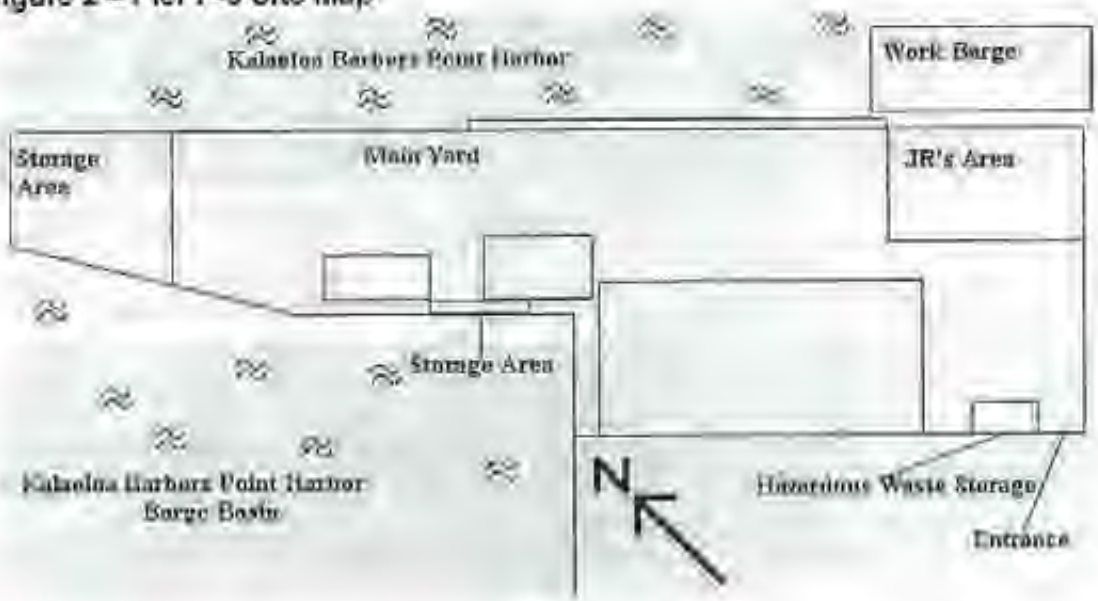
Figure 1 – Kalealoa Barbers Point Harbor

The Pier P-3 location can be separated into five main areas:

- A storage area at the southeast side of the Facility (referred to as JR's area),
- A hazardous waste storage area (located just southwest of JR's area),
- A work barge (located just northeast to JR's area),
- The main yard,
- A storage area at the northwest side of the Facility, and
- A smaller storage area behind (southwest) the office building.

Figure 2 is a diagram of the Pier P-3 location (not to scale).

Figure 2 – Pier P-3 Site Map



Industrial activities conducted at the Pier P-3 location include, but are not limited to: material storage, sand blasting, sanding, paint removal, paint application, welding, metal grinding and other metal fabrication, mechanical work, electrical work, petroleum storage, and hazardous waste storage.

JR's area is a storage area directly adjacent to the harbor's edge. The edge of the storage along the harbor is bermed. One significant breach of the berm between the storage area and the receiving water was observed and appears to be a potential discharge point for storm water. In addition, the far southeast edge of the berm ends abruptly, appearing to allow storm water to discharge directly into the receiving water. Heavy equipment, spent blasting grit (uncovered), 55-gallon drums of petroleum products and paint wastes, and other miscellaneous materials were observed stored in this location. A large used oil tank was in the area, but was not in use.

The hazardous waste storage area is covered and provides secondary containment. Also located in the vicinity was a 3,000 gallon diesel storage tank, and two portable double walled diesel tanks. It appeared that various liquids (hazardous and non-hazardous) are temporarily stored in front of the hazardous waste containment area. It appeared that storm water from this area would either flow to the main yard where it would be captured in a dry well, or would commingle with storm water from JR's area and potentially be discharged to the receiving water.

The work barge is a barge docked at the Pier P-3 Facility that is used as a storage and staging area. The Facility representative stated that the work barge would be removed from service soon, but was unsure of an exact date. The Facility representative further stated that storage and staging operations on the work barge had been reduced and

would continue to be minimized. During the inspection, the barge was being used for the storage of various materials (wood, metal, paints, 55-gallon drums of petroleum products, wire, rope, hoses, and other), and a staging area (cement was being mixed on the barge). An ice machine and sink are also located on the barge. Storm water controls or BMPs on the work barge were not observed during the inspection. Storm water would flow directly off the edge of the barge.

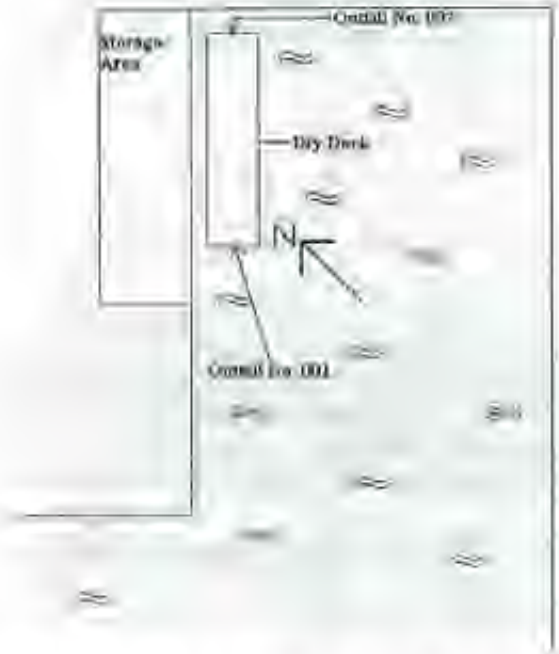
The main yard at the Pier P-3 Facility borders the harbor and the office buildings and enclosed work areas. The main yard is primarily used as a storage area and staging area for work going on throughout the Facility. Materials and equipment were observed stored on both sides of the main yard. Heavy equipment, including a large crane was also located on-site. It appeared that the main yard was graded so that most of the storm water from the center was directed into three dry wells, located in the center of the main yard. The Facility representative was not certain of the total capacity of the dry wells. The grading of the perimeter of the main yard was unclear to the inspector. The perimeter of the main yard was bermed, however multiple potential discharge locations through the berm were identified during the inspection. Evidence of runoff from the main yard through portions of the berm was also observed during the inspection.

The small storage area behind the office building and enclosed work areas was observed with pallets of paint, used zinc anodes, and 55-gallon drums. The small storage area was bermed, however a drain had been constructed to discharge runoff from the area directly into the receiving water. Two dogs were observed kenneled in this drainage location.

The area located across from Pier P-7 is where the dry dock, Lil Perris, is located. This location can be broken into two parts, the shore side portion that is adjacent to the dry dock, and the dry dock itself. Discharges from this location are clearly identified and regulated under NPDES Permit No. HI0021786.

Figure 3 is a diagram of the area located across from Pier P-7 (not to scale)

Figure 3 – Site Map (Lil' Perris Dry Dock)



The shore side area is used as a storage area and staging area for work on the Lil' Perris dry dock. Materials, objects, and equipment observed stored in this location included a portable toilet, used tires, 55-gallon drums, air compressors, cranes, scrap metal, various large tanks, rope, and chains. The area had a berm that was constructed out of cement pillars, plastic, and dirt. The berm had eroded and multiple potential discharge locations were observed down the entire length of the location.

The dry dock, Lil' Perris, has a certified capacity of 3,500 metric tons. Activities conducted on the dry dock include, but are not limited to; sandblasting, pressure washing, sanding, paint removal, paint application, welding, metal grinding and other metal fabrication, mechanical work, and electrical work. The two open ends of the dry dock had tarps drawn across them to minimize air blown particulates from reaching the receiving water. Structural BMPs, such as a berm, are not utilized on the dry dock.

Permitted Discharges

The portion of the Facility located on Pier P-3 is not addressed under NPDES Permit No. HI0021786. Further, the Facility does not have coverage under the Hawaii general industrial storm water permit or any other NPDES permit.

On March 31, 2006 the Discharger received authorization from DOH to discharge storm water from the Facility located on Pier P-3, under Chapter 11-55, Appendix B, NPDES General Permit Authorizing Discharges of Storm Water Associated with Industrial Activities. The general storm water permit expired at midnight on October 22, 2007. On January 11, 2008 DOH sent a letter informing the Discharger of the expiration and requested the Discharger submit a Notice of Intent or Notice of Cessation for the general permit renewal. The Discharger did not respond with a Notice of Intent or Notice of Cessation. On October 23, 2008 DOH again notified the Discharger that coverage under the general storm water permit had expired and that the DOH was assuming that the Discharger no longer required coverage under the general storm water permit. DOH further states in it's October 23, 2008 letter that non-permitted discharges to State Waters are violations of the Hawaii Water Pollution rules and regulations and the responsible parties may face civil and/or criminal prosecution of up to $25,000 per day for each violation.

The individual permit (NPDES No. HI0021786) addresses the portion of the Facility located across from Pier P-7. Authorized discharges under the permit include; the discharge of harbor water off the dry dock from Outfall Serial Nos. 001 and 002, and storm water runoff from the dry dock and shore from Outfall Serial Nos. 003 and 004. Potential sources of pollutants that may be discharged during the dry dock cycling (the lowering and lifting of the dry dock) and in storm water runoff from the shoreline areas and dry dock include materials used or stored, and waste products generated during repair and maintenance activities.

In addition, the discharge of noncontact cooling water is permitted through Outfall Serial No. 005, however the Facility representative stated that noncontact cooling water is no longer discharged from the Facility. Cooling water from vessels are pumped to tanker trucks and taken off-site for treatment. Additional discharges or discharge locations are not permitted under NPDES Permit No. HI0021786.

Treatment is not provided for water that contacts the dry dock during cycling or storm water runoff from the shore side area. The Facility relies on the proper implementation of BMPs to meet the established water quality objectives and meet effluent limitations. BMPs specified in Part B, section 2 the permit include:

- The Permittee shall provide appropriate and effective containment of sandblast grit during sandblasting activities to prevent the drift of grit. The Permittee shall immediately cease sandblasting activities when sandblast grit is observed drifting outside of the containment. The Permittee may resume sandblasting activities when effective containment is established.

- The Permittee shall clean the dry dock deck and other areas of the Facility, at the end of each day work is performed. The Permittee shall vacuum clean sandblast grit and other fine debris.

- The Permittee shall immediately clean up any spills, including, but not limited to, oil and hydraulic fluid.

- The Permittee shall contain and store collected spent sandblast grit from san blasting operation under a cover.

- The Permittee shall maintain all dry dock surfaces, including the top of the wing walls, to prevent chipped paint, rust, and other debris from entering the receiving water.

- Prior to lowering, the Permittee shall clean the surface of the dry dock to remove solids and other pollutants. If vacuuming is not sufficient for cleaning hard-to-reach areas, then the Permittee shall implement additional measures to ensure that solids are removed from these areas of the Best Available Technology (BAT) to prevent solids from contacting the dry dock.

- The Permittee shall discharge cooling water from the docked vessel directly to the receiving water in a manner that prevents the cooling water discharge from contacting the dry dock, docked vessel, or any other pollutant

- The Permittee shall properly store and dispose all wastes.

- The Permittee shall not discharge any wastewater or other pollutant into dry dock ballast tanks or any other dry dock compartment.

- The Permittee shall maintain land-based operations in a clean and orderly manner and implement measures to prevent pollutants from contacting storm water runoff.

In addition, Part B, section 5 requires the following:

- The Permittee shall develop and implement a BMPs [Best Management Practices] Plan to reduce pollutants discharged from the Facility

- The Permittee shall review and update the BMPs Plan as needed to comply with the permit.

- The Permittee shall train all appropriate and applicable employees to implement the BMPs Plan.

- The Permittee shall maintain the BMPs Plan on-site or at a nearby office.

Monitoring

The Discharger is required to conduct effluent (harbor water flowing off dry dock and noncontact cooling water), storm water, and ambient water monitoring as specified in Part A.1, A.2, and A.3 of NPDES Permit No. HI0021786.

Monitoring is conducted by the Facility's Heath, Safety, and EPA Compliance Officer. The analysis for pH and temperature is conducted on-site by Facility personnel. All additional analysis required under NPDES Permit No. HI0021786 are conducted by a contract laboratory, Inalab, Inc. (3615 Harding Ave., Suite 308, Honolulu, HI 96816).

The Facility representative stated that the contact harbor water flowing off the dry dock is sampled as a composite from multiple monitoring locations. Due to the topography of the harbor floor, the dry dock is not submerged evenly, but is lowered on one side more than the other. The southwestern end of the dry dock is submerged first during lowering activities, and the Facility representative pulls a sample from this area first, then as the dry dock is lowered more the Facility representative pulls additional aliquot samples as the harbor water moves further toward the northeast end of the dry dock. The Facility representative stated that the northeast end of the dry dock is never dropped below the water level, and no contact harbor water ever is discharged from the northeast side of the dry dock. Thus, only one of the two outfall locations (001) is reported as having a discharge. Prior to the lowering of each dry dock, the Discharger is required to photograph the dry dock surface to show the cleanliness of the dry dock surface. Ambient water monitoring is taken prior to any lowering and lifting activities.

When discharged, noncontact cooling water must be monitored monthly, downstream from any additions to the source water and prior to the cooling system, and downstream from the cooling system and prior to mixing with the receiving water. The date, starting time, ending time, duration, flow rate, and volume of each discharge of noncontact cooling water must be recorded.

Storm water runoff must be monitored annually. Grab samples must be taken within the first 15 minutes of a qualifying storm event, and composite samples composed of two aliquots, with the first one taken during the first 15 minutes, must be taken from qualifying storm events. A qualifying storm event is defined in the permit as a storm resulting in rainfall that accumulates more than 0.1 inches and occurs at least 72 hours after the previous measurable rainfall event.

The Facility representative (the Health, Safety, and EPA Compliance Officer) stated that he had never sampled a storm water discharge and was not aware of the exact shore side storm water discharge location. It should be noted that the Health, Safety, and EPA Compliance Officer stated that he had only been working in this capacity for the last 6 months.

The Facility representative stated that the DOH had requested that ambient receiving water data not be reported on the monitoring reports. This was confirmed by the Hawaii Department of Health (DOH) representative on-site (co-inspector), thus the lack of ambient receiving water data in the monitoring reports is not addressed in this report.

Records and Reports

As part of the inspection, records, plans, reports, and documentation specifically required by the NPDES permit or Standard Provisions was viewed on-site. The on-site review was not a thorough review of each record, plan, or report, and it's inclusion in the following list as being reviewed does not indicate complete adequacy and acceptance by the permitting agency. The records review is conducted to identify issues with record keeping, verify proper monitoring and reporting practices, identify required reports that have not been completed as specified in the NPDES permit, identify recent effluent limitation exceedances, and identify any other major compliance issues that may become apparent through the on-site review. Records, plans, reports, and documentation requested on the date of the inspection include:

- Copy of the current NPDES permit;
- Best Management Practices Plan;
- Last 3 months of discharge monitoring reports (DMRs) with chain-of-custodies and analytical data;
- Spill Prevention, Control and Countermeasure (SPCC) Plan;
- Dry dock cycle log (visual observations and pictures);
- Previous storm water report;
- pH calibration records;
- Sand blasting log; and
- Rain gage records.

As discussed in the Major Findings portion of this report, not all the requested documents were available for review on the date of the inspection.

The discharge monitoring report for December 2007 was reviewed as a component of this inspection. In addition, a review of draft monitoring reports for January 2008 through October 2008 were reviewed. The Discharger was required to have the monthly monitoring reports to DOH by the 28th of the following month. DOH had not received any of the monitoring reports for January 2008 to the date of the inspection. The review of the December 2007 monitoring report, and the prepared monitoring reports for January 2008 through October 2008, included a comparison of report monitoring requirements contained in the permit versus the data submitted by the Discharger to DOH (or summarized on the monitoring report for January 2008 through October 2008) and the results of that data versus limitations contained within the permit. Permit limitation exceedances were identified during the inspection and are summarized in the Major Findings portion of this report.

In addition, the discharge monitoring report for the annual storm water monitoring conducted in 2007 was requested as a component of this inspection. A copy of the storm water monitoring report was not available for review.

Site Review

A site review was conducted during the inspection. Site reviews are conducted to identify the following:

- Process/production modifications that may be pertinent to the NPDES permit;
- Treatment and collection systems to ensure they're properly maintained and in good operational order;
- Discharge locations, monitoring locations, waste streams, and on-site operations that are inconsistent with the NPDES permit, or irregularities that may be pertinent to the NPDES permit;
- Monitoring locations and methods to ensure they are representative of influent and effluent streams;
- General house keeping procedures to ensure that they are adequate to prevent/reduce the release of pollutants to the environment (i.e., proper implementation and maintenance of BMPs);
- Major on-site safety concerns that may interfere with the proper operation and maintenance of the Facility; and
- Any additional information that my be pertinent for determining compliance with NPDES permit requirements or may be pertinent for future NPDES permit renewals.

During the site review, multiple observations of poor housekeeping were observed and are summarized in the Major Findings portion of this report. Further, during the inspection it became evident that the BMP Plan needed revisions to specific areas of concern at the Facility. See the Major Findings portion of this report for more information.

The berms at both the Pier P-3 location and shoreside to the dry dock were observed to have multiple breaches and provided multiple potential discharge locations for storm water. The berms at the Facility do not offer reliable secondary containment.

The portion of the Facility located on Pier P-3 does not appear to be addressed in NPDES Permit No. HI0021786. Potential discharges were identified that were not authorized under NPDES Permit No. HI0021786.

Major Findings

1. Part 4 of the Standard Provision requires the Permittee to submit a new application 180 days before the existing permit expires if the Permittee wishes to continue activities regulated by the permit.

NPDES Permit No. HI0021786 expires on March 31, 2009. A renewal application was due by October 2, 2008. Following the inspection, the inspector was informed on February 6, 2009 by DOH that the Permittee submitted their permit renewal application on January 29, 2009. The Permittee did not submit their permit renewal application at least 180 days before the expiration date, as required.

2. Part A.2.a of NPDES Permit No. HI0021786 establishes effluent limitations and monitoring requirements for storm water runoff associated with industrial activity through Outfall Serial Nos. 003 and 004.

   The Health, Safety, and EPA Compliance Officer was unaware of the storm water monitoring requirements contained in the permit and was unsure of the exact storm water monitoring location for shoreside activities. In addition, the Facility representative was unable to provide a recent storm water monitoring report (Standard Provision 14.b requires that all monitoring records be maintained for a minimum of 5 years). As a result, the Discharger could not demonstrate that storm water monitoring is being conducted as required by Part A.2.a of the permit.

3. Part B.5.a of NPDES Permit No. HI0021786 requires the Discharger to review and update the BMPs Plan as needed to comply with the permit, within 30-days from the date that the changes were made. Further, the Discharger must maintain documentation of all changes made to the plan.

   The most recent BMP Plan available for review on the date of the inspection was last revised in October 2002. The BMP Plan does not appear to have been updated during the term of the current permit and does not accurately reflect current Facility site conditions. The BMP Plan incorrectly refers to Outfall Serial No. 004 as the storm water discharge from the dry dock (Outfall Serial No. 004 is the storm water discharge point for land based operations), and Outfall Serial No. 005 as a storm water discharge from the land based operations (Outfall Serial No. 005 is the discharge point for non-contact cooling water). The BMP Plan also refers to Outfall Serial No. 006 (for storm water runoff from land based operations), 007, 008, 009, and 010 (for non-contact cooling water).

   In addition, the BMP Plan does not address potential storm water discharge locations, potential pollutants, and activities performed on the portion of the Facility located on Pier P-3.

4. Part B.4.a of NPDES Permit No. HI0021786 requires the Discharger to maintain monthly logs of all dry dock cycling activities.

   Analytical data from Inalab indicates that a monitoring event occurred on June 2, 2008 while undocking the "Wild Thing". A review of the dry dock cycling log does not record this cycling event, however states that the "Wild Thing" was undocked on May 27, 2008, with the "Tiger 3". A review of analytical records indicates that monitoring did occur on May 27, 2008, but only for the undocking of the "Tiger 3". The dry dock cycling log is inconsistent with the monitoring records. Further, a

chain-of-custody was not available for the June 2, 2008 monitoring event (as required by Standard Provision 14.c).

A copy of the dry dock cycling log and analytical data for June 2, 2008 is included in this report as Attachment A.

5. Part B.4.b of NPDES Permit No. HI0021786 requires the Discharger to maintain daily logs documenting all the sand blasting activities conducted at the Facility and submit a summary of each month's logs with the monthly monitoring reports.

   The Facility representative was unable to provide a log documenting sand blasting activities at the Facility. Standard Provision 14.b requires that all monitoring records be maintained for a minimum of 5 years.

6. Part B.4.e of NPDES Permit No. HI0021786 requires the Discharger to maintain on-site rain gage records and submit a summary of the logs with the monthly monitoring reports.

   The Facility representative was unable to provide records of rainfall at the Facility. Further, the Facility representative stated that a rain gage had been purchased, but had not yet been installed. A usable rain gage was not available for observation on the date of the inspection.

7. Part C.1.d of NPDES Permit No HI0021786 requires the Discharger to submit monitoring reports (or have them postmarked), no later than the 28th day of the month following the completed reporting period, to the EPA and DOH.

   Prior to the inspection DOH indicated to the inspector that no monitoring reports have been received from the Discharger for the months of January 2008 through October 2008. The Facility representative stated that the monitoring reports for January 2008 through October 2008 had been mailed as required by the permit, however they had failed to arrive at DOH each month. A copy of these final reports was not available for review on the date of the inspection (Standard Provision 14.b requires the Discharger to maintain records for a minimum of 5 years), no evidence that these reports had been submitted to DOH was available to confirm the statement made by the Facility representative.

   The Facility representative provided to the inspectors "draft monitoring reports" for January through October 2008, however the Facility representative stated that these had not undergone final review and did not contain a certification signature as required under Standard Provision 5.d. DOH had previous notified the Facility that the monitoring reports for January 2008 through October 2008 had not been received. Thus, the Facility representative stated that they intended to complete the draft monitoring reports and subsequently submit them to DOH.

8. A detailed review of the draft monitoring reports and analytical data for February 2008, May 2008, and June 2008 was conducted to determine if permit limit exceedances had occurred during the period in which monitoring reports were not

received by DOH. The following exceedances of the effluent limitations contained in Part A.1.a of NPDES Permit No. HI0021786 were identified for harbor water flowing off the dry dock:

Table 1. February 2008

Parameter	Effluent Limitation	Monitoring/Discharge Events
		2/2/2008
Copper	2.9 µg/L	83 µg/L
Zinc	95 µg/L	100 µg/L

Table 2. May 2008

Parameter	Effluent Limitation	Monitoring/Discharge Events	
		5/19/2008	5/27/2008
Copper	2.9 µg/L	390 µg/L	1,300 µg/L
Zinc	95 µg/L	510 µg/L	490 µg/L

Table 3. June 2008

Parameter	Effluent Limitation	Monitoring/Discharge Events		
		6/2/2008	6/10/2008	6/20/2008
Copper	2.9 µg/L	590 µg/L	470 µg/L	790 µg/L
Zinc	95 µg/L	310 µg/L	200 µg/L	200 µg/L

For the months of March, July, September, and October 2008, the Discharger had indicated that there were no discharges from the Facility. Due to time constraints on the date of the inspection, monitoring reports for April and August were not reviewed.

A copy of the Draft February, May, and June 2008 monitoring reports and the applicable analytical data is included as Attachment B.

ii. Standard Provision 14.b requires that all monitoring records be maintained for a minimum of 5 years.

It was observed in the dry dock cycling log that a cycling event occurred on August 22, 2008. Part A.1.a requires the Discharger to conduct monitoring during each dry dock cycle. The dry dock cycling log does state that monitoring occurred at the time of the cycling, however a copy of the analytical data for this monitoring event was not available for review on the date of the inspection. The Facility representative stated that a copy of the analytical data could be retrieved from the laboratory if necessary.

A copy of the page in the dry dock cycling log that indicates a cycling event occurred on August 22, 2008 and that effluent and ambient monitoring occurred is included at Attachment C.

10. Part A.4 of NPDES Permit No. HI0021786 requires the Discharger to use test methods promulgated in 40 CFR Part 136.

The Facility representative stated that all effluent samples for the harbor water running of the dry dock is taken using a plastic scoop and a plastic bucket, prior to distributing the effluent into the appropriate sample containers issued by the contract laboratory. 40 CFR Part 136 requires that all samples for oil and grease be taken directly into a glass container. The monitoring method described by the Facility representative for sampling oil and grease does not meet the requirements of 40 CFR Part 136.

11. Standard Provision 14.b requires the Discharger to retain all monitoring information including calibration records for a minimum of 5 years. Standard Provision 3.c requires the Discharger to periodically calibrate all monitoring and analytical equipment at 6 month intervals or the manufacturer's recommended intervals.

Calibration records for the pH meter used by the Discharger to demonstrate compliance with the effluent limitations contained in NPDES Permit No. HI0021786 were not available for review. The Facility representative indicated that these records were not maintained.

12. Standard Provision 3.c requires the Discharger to periodically calibrate all monitoring and analytical equipment to insure the accuracy of measurements. The Facility conducts pH analysis on-site using a pH meter, to determine compliance with the effluent limitations contained in NPDES Permit No. HI0021786.

The pH buffer (4.0) available on-site to conduct the calibrations of the pH meter had an expiration date of October 2004. A current pH buffer was not available for the calibration of the pH meter.

13. Parts B.2.a through B.2.i of NPDES Permit No. HI0021786 establishes pollution prevention measures required by the Discharger. Part B.5 of NPDES Permit No. HI0021786 requires the Discharger to develop and implement a BMP[s] Plan to reduce pollutants discharged from the Facility, and update the BMP[s] Plan as needed.

The Discharger has developed a BMP Plan, a portion of which is included as Attachment D to this report.

Breaches of the berm surrounding the shore side area next to the dry dock were observed down the entire length of the berm (Photo Nos. 49, 54, 55, and 58). In addition, the deck of the dry dock was observed to not have a berm (Photo No. 59). The Facility representative stated that the berm around the deck of the dry dock had been removed.

14. The following observations at the dry dock, and shore side of the dry dock, were made during the inspection and do not appear to comply with the proper

implementation of BMPs as specified in either Part B of NPDES Permit No. HI0021786 or the Discharger's BMP Plan (dated October 2002):

a. Two 55-gallon drums of used oil were observed stored without secondary containment on the shore side staging area beside the dry dock (Photo No. 51). This does not appear consistent with Part B.2.j of the permit which states, "The Permittee shall maintain land-based operations in a clean and orderly manner and implement measures to prevent pollutants from contacting storm water runoff. Further this is not consistent with land-based operation BMPs of the Discharger's BMP Plan (on page 8), which states that spill pallets will be on-site and used.

b. A mixture of oil and condensate was observed dripping directly on the ground from an air compressor on the shore side staging area beside the dry dock (Photo No. 53). This does not appear to be consistent with Part B.2.j of the permit which states, "The Permittee shall maintain land-based operations in a clean and orderly manner and implement measures to prevent pollutants from contacting storm water runoff.

c. Sand blasting grit was observed spilled on the ground, shore side of the dry dock (Photo No. 56). Further, multiple bags of new sand blasting grit were observed stored on-site without cover (Photo No. 57). This does not appear consistent with Part B.2.j of the permit which states, "The Permittee shall maintain land-based operations in a clean and orderly manner and implement measures to prevent pollutants from contacting storm water runoff. Further, this is not consistent with land-based operation BMPs of the Discharger's BMP Plan (on page 8 of the Plan), which states that sand blast grit [new or spent] will be covered.

d. The dry dock does not have any structural BMPs, such as a berm (Photo No. 59) to contain potential discharges from washing/cleaning activities. The Discharger's BMP Plan states, under low pressure/low volume cleaning, and ultra-high pressure water blasting (pages 4 and 5), that a 4" inch berm is on the foreward and after ends of the dry dock to contain any liquids generated on-site. The Facility representative further stated that temporary berms or containment BMPs are not set up on the dry dock.

e. Zinc anodes were observed stacked on a pallet on the dry dock (one zinc anode was observed directly on the deck of the dry dock), uncovered where it could be exposed to potential rainfall and storm water runoff, and potentially contaminating the deck of the dry dock with zinc (Photo Nos. 61 and 62). Zinc was identified during the monitoring reports review to be a pollutant of concern in the effluent from the dry dock, that has frequently exceeded the effluent limitations contained in the permit. The BMP Plan does not appear to address storm water contamination and the contamination of the dry dock deck by zinc anodes. Part B.5 of the permit requires the Discharger to implement a BMP Plan to reduce pollutants from the Facility, and review the

BMP Plan as needed to comply with the permit. The BMP Plan should be revised to address potential sources of zinc pollution, including the handling and storage of zinc anodes.

13. The portion of the Facility located on Pier P-3 is not permitted under NPDES Permit No. HI0021786, nor is it permitted under the Hawaii general industrial storm water permit. NPDES Permit No. HI0021786, Part B.1 prohibits discharges to the receiving water not specifically authorized under the permit. Further, the Pier P-3 portion of the Facility is not addressed in the BMP Plan. Activities and discharges from the portion of the Facility located on Pier P-3 do not appear to be authorized under the NPDES program. The following findings are observations of the portion of the Facility located on Pier P-3.

    The berms around the main yard, JR's area, and the storage area behind the main yard were observed to have breaches, deliberate discharge structures, or areas that lacked containment, resulting in potential storm water discharge locations (Photo Nos. 8, 10, 11, 15, 23, 24, 25, and 27).

    Due to the lack of sufficient berming, and the potential for storm water discharges, the following observations were made regarding the need for secondary containment or over head coverage:

    a. A 55-gallon drum of engine oil, adjacent to the receiving water, next to the main yard (Photo No. 3);

    b. A 55-gallon drum of hydraulic fluid, adjacent to the receiving water, next to the main yard (Photo No. 6);

    c. A "make-shift" drip pan containing an unidentified liquid resembling a petroleum product, next to the berm in the main yard, uncovered and exposed to potential rain fall, and without additional containment (Photo No. 7);

    d. A pallet of batteries next to the berm in the main yard (Photo No. 9);

    e. Large quantities of paint and paint thinner, next to the berm in the main yard (Photo 14). The Facility representative stated that this was a temporary measure while they cleaned out their paint storage lockers;

    f. A drip pan for an air receiver, next to the metal working building, which was full of a mixture of oil and condensate. The drip pan was uncovered and exposed to potential rain fall, and without additional containment (Photo No. 16);

    g. Two 55-gallon drums of oily water in the main yard, next to the berm, without secondary containment (Photo No. 17);

h. A box/pallet of zinc anodes, and a couple pallets of paint cans, in the storage area behind (northwest) of the main yard, behind the metal working building (Photo Nos. 19, 20, and 21);

i. A 5-gallon bucket of motor oil in JR's Area, without containment (Photo No. 28);

j. Three 55-gallon drums of petroleum products in JR's area without secondary containment (Photo Nos. 29, 30, and 31);

k. Two 55-gallon drums of paint related waste (potentially hazardous waste, unlabeled) in JR's area, without secondary containment (Photo Nos. 32 and 33);

l. A tote of diesel fuel, improperly labeled as flocculant, stored next to the hazardous waste storage area (the tote was identified as diesel fuel by the Facility representative) (Photo Nos. 34 and 35); and

m. A drip pan for a 3,000 gallon diesel tank, half full of diesel, next to the hazardous waste storage area, exposed to rain fall, without secondary containment (Photo No. 36).

16. The Discharger had recently concreted portions of the main yard, JR's area, and the storage area behind (northeast of) the metal working building. Evidence of concrete not being properly contained, and in some cases overflowing into the receiving water, was observed (Photo Nos. 12, 22, and 26).

17. Signs of spillage and staining were observed in portions of the main yard (Photo No 13).

18. A discharge of wash water runoff was observed from the storage area behind (northeast of) the metal working building through an intentionally built discharge point. A worker was observed spraying down the area to a discharge location. In addition to the storage of zinc anodes and paint cans, two dogs were observed kenneled in this area (Photo Nos. 23 and 24).

19. Spent blasting grit was observed stored in JR's area without coverage (Photo No. 25).

20. Two workers were observed mixing cement on the work barge. Wet cement was observed on the ground of the work barge. Runoff from the cement mixing was observed running under the wall and down the side of the work barge into the receiving water (Photo Nos. 37, 38, and 39).

21. The deck of the work barge was observed to be covered in rust chips/dust, which were exposed to potential storm water runoff (Photo No. 42).

22. Zinc anodes were observed in direct contact with the deck of the work barge, and exposed to potential storm water runoff (Photo Nos. 43 and 46).

23. Hoses used to supply workers with potable water as they work on-board docked vessels were observed leaking and draining over the edge of the work barge (Photo Nos. 43 and 44).

24. A sink was observed on the stern of the work barge. The Facility representative stated that he believes the sink discharges directly into the harbor below. The Facility representative stated that the sink was used for washing hands and cleaning fish. Due to the location of the sink, it was not possible to confirm the discharge location of the sink into the harbor.

MARISCO, LTD. (NPDES No. HI0021786) Photo Log
Inspected by: Dan Connally (PG Environmental, LLC); Matt Kurano (Hawaii Department of Health)

The following photographs were taken during the inspection of Marisco, LTD. during the NPDES compliance evaluation inspection on December 9, 2008, by a USEPA contractor, Dan Connally (PG Environmental, LLC.) and Matt Kurano (HI Department of Health).

Portion of Facility	Photograph(s)
Main Yard	1 through 18
Storage Area Behind Main Yard	19 through 24
Storage Area at Southeast End of Main Yard	25 through 33
Hazardous Waste Storage Area	34 through 36
Work Barge	37 through 46
Lil' Parris – Shore Side	47 through 58
Lil' Parris – Dry Dock	59 through 62

Inspection Date: December 9, 2008

MARISCO, LTD. (NPDES No. HI0021786) Photo Log
Inspected by: Dan Connally (PG Environmental, LLC); Matt Kurano (Hawaii Department of Health)

Main Yard

Photo 1: This photograph provides an overview of the dock, beyond the containment berm and on the edge of the water. This photograph is taken facing northwest. This area appeared to be used mostly as a walk way to the docked vessels, however observations during the inspection suggest that at a minimum, temporary or short-term storage of materials, including petroleum products, occurs at this location.

Photo 2: This photograph provides an overview of the main yard from approximately 3/4ths of the way down the southeast side. The Facility representative stated that most of the rainfall that occurs on-site is collected in the middle of the yard in three dry wells. The Facility representative was unsure of the volume of the dry wells. The gradient of the concreted area does suggest that the majority of the rainfall would drain toward the center of the main yard and into the dry wells. However, the gradient of the main yard near the bermed area was not apparent, and evidence of flow through gaps in the berm were observed during the inspection.

Photo 3: This photograph provides an overview of the dock, beyond the containment berm on the edge of the water, slightly further back than Photo 1. A 55-gallon drum of engine oil was observed on-site, exposed to potential rain fall, adjacent to the receiving water, and without secondary containment.

Photo 4: This photograph provides an overview of the dock, beyond the containment berm on the edge of the water, between the "Working Barge" and "JR's Area". This photograph is taken facing southeast. The 55-gallon drum pictured above is a spill kit.

Photo 5: This photo was taken from the on-site "work barge", and depicts the drop-off from the bermed areas of the Facility directly into the receiving water. This is typical of the area referred to as "JR's Area" (area pictured above), and the portion of the main yard at the northwest end of the Facility, beyond the dockside walk way.

Photo 6: A 55-gallon drum of hydraulic fluid was observed on-site, adjacent to the receiving water, without secondary containment.

Photo 7: Unidentified liquid contained in a "make-shift" drip pan, resembling other petroleum products observed on-site, in the main yard adjacent to the berm surrounding the main yard.

Photo 8: A break in the berm for the main yard.

Photo 9: A pallet of used batteries stored in the main yard, adjacent to the berm around the main yard. A drainage hole in the berm was observed down gradient of this location (see Photo 9).

Photo 10: A drainage hole in the berm of the main yard, down gradient of the pallet of used batteries.

Photo 11: Debris and silt were observed around the drainage hole in the berm. Signs of erosion were observed on the water's side of the berm, indicating that discharges from this drainage hole have occurred. Flow through this discharge location would flow down the bank and directly into the receiving water.

Photo 12: An ongoing construction project was observed on-site. Evidence of concrete spillage into the receiving water was observed on-site.

Photo 13: Signs of spillage and staining were observed in portions of the main yard.

Photo 14: Large quantity of buckets of paint and paint thinner were observed in the yard, uncovered and without secondary containment. The Facility representative stated that this was a temporary measure while they cleaned out their paint storage lockers.

Photo 15: This is a photograph of the northwest end of the main yard. The Facility does not have a berm at this end of the Facility. Note the on-site spill kit.

Photo 16: A drip pan for an air receiver located beside the metal working building full of a mixture of oil and condensate was observed. The drip pan was uncovered, exposed to potential rain fall, and without additional containment.

Photo 17: Two 55-gallon drums of oily water were observed next to the berm without secondary containment.

Photo 18: Material storage on the northwest end of the main yard. Engines, pumps, and other equipment were observed in this area.

Storage Area Behind Main Yard

Photo 19: An area northwest of the main yard, behind the metal working building appears to be used for material storage. Materials stored in this area include paint, zinc anodes, and 55-gallon drums. This area does have a containment berm, which directs all storm water to a storm water discharge location pictured in Photo Nos. 23 and 24. A pallet of paint cans was observed stored on-site, exposed to potential rainfall, and in the direct drainage area to a storm water outfall.

Photo 20: Additional cans of paint and zinc anodes were observed stored behind the metal working building, southwest of the main yard, exposed to potential rainfall and in the direct drainage area to a storm water outfall.

Photo 21: A wooden box of old zinc anodes were observed stored in the area behind the metal working building, exposed to potential rain fall and in the direct drainage area for a nearby storm water discharge location.

Photo 22: Evidence of concrete spillage from an on-site construction activity (possibly the construction of the concreted area itself or the berm) toward the receiving water. It is unclear if any of the concrete actually entered the receiving water. However this photo demonstrates a lack of effective best management practices utilized for the construction project by the Discharger this close to the edge of the receiving water.

Photo 23: During the inspection, a storm water discharge location for the concrete area behind the metal working building was observed. Zinc anodes and paint cans are stored in this location. In addition, two dogs were observed chained in this area. Later in the day, a worker was observed hosing down the area toward the storm water outfall. Wash water runoff is visible discharging down the outfall.

Photo 24: Another photograph of the storm water outfall for the area behind the metal working building. Wash water runoff is visible discharging down the outfall.

Storage Area at Southeast End of Main Yard (JR's Area)

Photo 25: A view from the on-site working barge of the storage area at the southeast end of the main yard. This area was referred to by the Facility representative as "JR's Area". This area has a berm, with identified discharge locations (at the south end of the berm or left side of the photograph, and a gap in the berm to the right where the photograph cuts off). Materials observed stored in this location include used sand blasting grit, heavy equipment, petroleum products, and paint waste (what appeared to be a mixture of paint and paint thinner).

Photo 26: Evidence of concrete spillage from an on-site construction activity (possibly the construction of the concreted area itself or the berm) toward the receiving water. It is unclear if any of the concrete actually entered the receiving water, although concrete observed on the very edge of the metal frame work would indicate that it did. However this photo demonstrates a lack of effective best management practices utilized for the construction project by the Discharger this close to the edge of the receiving water.

Photo 27: A gap in the berm surrounding JR's area. Discharges through this gap would flow down the bank and directly into the receiving water.

Photo 28: This photograph shows a 5-gallon bucket of motor oil (as identified by the Facility representative) in "JR's Area", without secondary containment.

Photo 29: Three of the 55-gallon drums pictured (and labeled) above appeared to contain petroleum products, including motor oil and diesel fuel. These drums are not in a contained area, do not have secondary containment, and are exposed to potential rain fall.

Photo 30: One of the three drums referenced above.

Photo 31: One of the three drums referenced above.

Photo 32: Two 55-gallon drums of "paint related waste" (as described by the Facility representative), which appeared to be a mixture of paint and paint thinner were stored on a secondary containment pallet, in "JR's Area", outside the designated hazardous waste storage area. The drum pictured above was opened by the Discharger at the inspector's request (as shown in Photo 31). One of the drums was hanging over the edge of the containment pallet.

Photo 33: A photograph of the substance inside one of the two 55-gallon drums described in Photo 32. The drum pictured above was opened by the Discharger at the inspector's request.

Hazardous Waste Storage Area

Photo 34: Hazardous waste storage area located adjacent to the main yard entrance of the Facility. Additional drums of paint related waste is shown above, outside the hazardous waste containment area. The white tote has been filled with diesel fuel and is inappropriately labeled as flocculent. Approximately 11 totes were observed in the area, outside any containment area, with residual liquid.

Photo 35: A tote originally used for flocculent was being used to store diesel fuel, without secondary containment. The tote was labeled as flocculent.

Photo 36: A drip pan for a 3,000 gallon diesel tank was observed containing diesel, open and exposed to rain fall, without secondary containment.

Work Barge

The "work barge" is a barge that is docked along the main yard of the facility and appears to be used mainly as a staging area and material storage area for work performed on vessels that are docked at the facility.

Photo 37: Two workers were observed mixing cement on the work barge. Wet cement was observed on the ground of the work barge. Runoff from the cement mixing was observed running under the wall and down the side of the work barge into the receiving water, as shown in Photo No. 39.

Photo 38: A closer photograph of the runoff from the cement mixing going under the wall of the work barge. Further, the Facility representative stated that condensate from the ice maker discharges under the wall and over the side of the work barge as well.

Photo 39: Evidence of runoff from the cement mixing on-board the work barge.

Photo 40: The floor of the work barge was covered in general debris and rust chips/dust, exposed to potential storm water runoff.

Photo 41: Debris and materials scattered on the floor of the work barge outside a storage shed. Two 55-gallon drums of oil were observed on the deck of work barge, without secondary containment.

Photo 42: This is the deck of the work barge facing northwest. Note the rust chips/dust, zinc anode, and dripping water on the deck.

Photo 43: These water lines are used to supply the workers with potable water as they work on-board vessels. The line/hose hook ups were observed leaking and draining over the edge of the work barge. Also pictured above is a zinc anode on the deck of the work barge, near the draining water.

Photo 44: Potable water from hoses on the work barge was observed flowing over the deck and into the receiving water.

Photo 45: A sink was observed on the stern of the work barge. The Facility representative stated that he believes the sink discharges directly into the harbor below. The Facility representative stated that the sink is used for washing hands and cleaning fish. Due to the location of the sink, it was not possible to confirm the discharge location of the sink.

Photo 46: Another zinc anode observed on the deck of the work barge, exposed to potential storm water runoff.

Lil' Parris – Shore Side

Photo 47: The photograph above is an overview of the northeast portion of the shore side staging area for the Lil' Perris dry dock. This area is used by the Discharger for storing materials for work performed on the dry dock. Materials stored in this area include scrap metal, old tires, cables, and machinery. Other materials are stored on-site in covered sheds.

Photo 48: The shore side staging area for the Lil' Perris dry dock has a berm built from cement pillars. Plastic sheeting has been laid down against the pillars and covered with dirt, however the plastic sheeting has torn away in most areas and gaps are prevalent along the entire berm.

Photo 49: One of the gaps in the berm surrounding the shore side staging area for the Lil' Perris dry dock.

Photo 50: An overview of the Lil' Perris dry dock and the berm structure.

Photo 51: Two 55-gallon drums of used oil were observed stored without secondary containment on the shore side staging area beside the Lil' Perris dry dock.

Photo 52: Staining of the ground by exhaust from an on-site air compressor.

Photo 53: A mixture of oil and condensate dripping from the above pictured air compressor.

Photo 54: Another gap developed through erosion in the berm.

Photo 55: Another gap in the berm.

Photo 56: Sand blasting grit was observed on the ground, exposed to potential storm water runoff.

Photo 57: Sandblast grit stored on-site, un-covered.

Photo 58: Another gap in the berm.

Lil' Parris – Dry Dock

Photo 59: An overview of the Lil' Perris dry dock facing northeast.

Photo 60: A vessel was docked in the Lil' Perris dry dock on the date of the inspection. Work on the vessel was not performed in the presence of the inspector; however work on the vessel had occurred early in the day.

Photo 61: Zinc anodes were observed stored on the dry dock, uncovered and exposed to potential rain fall.

Photo 62: A zinc anode was observed on the floor of the dry dock, exposed to potential storm water runoff.

ATTACHMENT A

Analytical data from Inalab indicates that a monitoring event occurred on June 2, 2008 while undocking the "Wild Thing". A review of the dry dock cycling log does not record this cycling event, however states that the "Wild Thing" was undocked on May 27, 2008, with the "Tiger 3". A review of analytical records indicate that monitoring did occur on May 27, 2008, but only for the undocking of the "Tiger 3". The dry dock cycling log is inconsistent with the monitoring records.

Mr. Bill McCaffery
Haseko, Ltd.
91-007 Makakaio Road

Kapolei HI 96707

Phone Number: (808) 682-1933
Facsimile: (808) 682-6845

Analytical Results

INALAB JOB NO: 20050052
CLIENT REFERENCE: ABQ-02; P.O. #79316 (6/2/05); UNDOCK - WILD HONG

******* Total Recoverable Copper in Seawater *******

EPA Method: 200.12 / 220.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20050003016	LIL PERRIS: Composite Water - AMBIENT (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	17	ug/L	6/3/05	6/23/05
REMARKS:						
20050003019	LIL PERRIS: Composite Water - EFFLUENT (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	[illegible]	ug/L	6/3/05	6/23/05
REMARKS:						
20050003024	LIL PERRIS: Composite Water - METALS CONTROL (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	1.7	ug/L	6/3/05	6/23/05
REMARKS:						

BATCH QC/QA
Analyte Recovery (%): 100 Precision (% RPD): <1 System Blank: Acceptable

******* Total Recoverable Lead in Seawater *******

EPA Method: 200.12 / 239.1 / 239.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20050003016	LIL PERRIS: Composite Water - AMBIENT (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 47	ug/L	6/3/05	6/23/05
REMARKS:						
20050003019	LIL PERRIS: Composite Water - EFFLUENT (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 44	ug/L	6/3/05	6/23/05
REMARKS:						
20050003024	LIL PERRIS: Composite Water - METALS CONTROL (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 44	ug/L	6/3/05	6/23/05
REMARKS:						

BATCH QC/QA
Analyte Recovery (%): 110 Precision (% RPD): <1 System Blank: Acceptable

INALAB, Inc. is an AIHA IHLAP ACCREDITED LABORATORY (Accreditation No. 101812) with scope of accreditation including metals, solvents, fiber counts and bulk asbestos. INALAB, Inc. is a participant in the Compressed Air Proficiency Test (CAPT) program.

07/07/2005 12:04 9087358047 INALAB/HONOLULU

DATE	Action / Vessel	Type Vessel	Sched Cycle Time	Actual Cycle Time	Comments
5/19/08	UNDOCK Mini'oi	Tug	0700	0730	AMB - 0700 EFF - 0735
5/20/08	~~UNDOCK~~ Tiger 3	Tug	0800	0815	No Action Required Clear Dock
5/27/08	UNDOCK Tiger 3 KBOS Wildthing	Tug Tourboat	0630	0700	AMB - 0615 EFF - 0715
5/27/08	Dock MV FINOLA	Cattle Hauler	1500	1500	No Action Required
5/28/08	UNDOCK FINOLA	Cattle Boat	1400	1430	AMB - 1350 EFF 1415
6/7/08	Dock Jimmy Smith	Tug	830	8:15	No Action Required
6/10/08	UNDOCK Jimmy Smith	Tug	0800	0815	AMB - 0745 EFF - 0930
6/14/08	Dock Sause Kokua	Tug	1400	1400	No Action Req.
6/20/08	UNDOCK Kokua	Tug	1300	1330	AMB - 1215 EFF - 1330

ATTACHMENT B

A detailed review of the draft monitoring reports and analytical data for February 2008, May 2008, and June 2008 was conducted to determine if permit limit exceedances had occurred during the period in which monitoring reports were not received by DOH. Effluent limit exceedances are summarized the 'Major Findings' section of this report, Finding 8. The corresponding discharge monitoring reports and analytical data are included in this attachment.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

SUBMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: MARINCO LTD
ADDRESS: 91-607 MALAKOLE RD
KAPOLEI, HI 96707

FACILITY: "LIL" PERRIS FLOATING DRYDOCK
LOCATION: 91-607 MALAKOLE RD
KAPOLEI, HI 96707

PERMIT NUMBER	DISCHARGE NUMBER
HI0021788	002A

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	08	02	01	TO	08	12	28

DMR MAILING ZIP CODE: 96707
MINOR

Harbor water flowing off drydock during lowering
External Outfall

No Discharge ☐

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX.	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Chromium, total recoverable	SAMPLE MEASUREMENT	-----	-----		-----	-----	<26			1/28	
01118 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	1000 DAILY MX	ug/L		Once Per Discharge	COMPOSITE
Copper, total recoverable	SAMPLE MEASUREMENT	-----	-----		-----	-----	83			1/28	
01119 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	2.9 DAILY MX	ug/L		Once Per Discharge	COMPOSITE
Oil and grease	SAMPLE MEASUREMENT	-----	-----		-----	-----	<5			1/28	
03582 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	15 DAILY MX	mg/L		Once Per Discharge	GRAB
Trichlorethylene, Total Recoverable	SAMPLE MEASUREMENT	-----	-----		-----	-----	N/A			1/28	
51515 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	DAILY MX	ug/L		Once Per Discharge	COMPOSITE
Mercury, total recoverable	SAMPLE MEASUREMENT	-----	-----		-----	-----	<0.1			1/28	
71901 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	DAILY MX	ug/L		Once Per Discharge	COMPOSITE
Flow	SAMPLE MEASUREMENT		-----		-----	-----	-----			1/28	
74079 1 0 Effluent Gross	PERMIT REQUIREMENT	Req. Mon. DAILY MX	-----	gal/d							ESTIMATE

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER			TELEPHONE		DATE		
			AREA CODE	NUMBER	YEAR	MO	DAY
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT					

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

EPA Form 3320-1 (Rev. 01/98) Previous editions may be used.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved.
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

Page 1

NAME: MARISCO LTD
ADDRESS: 91-607 MALAKOLE RD
KAPOLEI, HI 96707

FACILITY: "LIL" PERRIS FLOATING DRYDOCK
LOCATION: 91-607 MALAKOLE RD
KAPOLEI, HI 96707

HI0021756	002A
PERMIT NUMBER	DISCHARGE NUMBER

DMR MAILING ZIP CODE: 96707
MINOR

Harbor water Draining off drydock during cleaning
External Outfall

No Discharge ☐

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	08	02	01	TO	08	02	28

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX.	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
pH	SAMPLE MEASUREMENT	-----	-----		8.0	-----	8.0			1/28	
00400 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		MINIMUM	-----	MAXIMUM	SU		Quarterly Continuous	Grab
Solids, total suspended	SAMPLE MEASUREMENT	-----	-----		-----	-----	4.2			1/28	
00530 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	30 DAILY MAX	mg/L		Quarterly Continuous	Grab
Solids, settleable	SAMPLE MEASUREMENT	-----	-----		-----	-----	<0.1			1/28	
00545 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	-----	mL/L		Quarterly Continuous	Grab
Arsenic, total recoverable	SAMPLE MEASUREMENT	-----	-----		-----	-----	<0.6			1/28	
00978 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	48 DAILY MAX	ug/L		Quarterly Continuous	Grab
Zinc, total recoverable	SAMPLE MEASUREMENT	-----	-----		-----	-----	100			1/28	
01094 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	1000 DAILY MAX	ug/L		Quarterly Continuous	Grab
Cadmium, total recoverable	SAMPLE MEASUREMENT	-----	-----		-----	-----	<3.3			1/28	
01113 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	43 DAILY MAX	ug/L		Quarterly Continuous	Grab
Lead, total recoverable	SAMPLE MEASUREMENT	-----	-----		-----	-----	<1.8			1/28	
01114 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	140 DAILY MAX	ug/L		Quarterly Continuous	Grab

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER			TELEPHONE		DATE		
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

EPA Form 3320-1 (Rev. 2-98) Previous editions may be used.

Mr. Bill McCaffery
Makaiwa, Llc
91-007 Makaiwa Road

Kapolei HI 96707

Phone Number: (808) 682-1333
Facsimile: (808) 682-5848

Analytical Results

INALAB JOB NO: 20080366

CLIENT REFERENCE: PO#: 78357 (2/28/08) ABG04 KAHANA ABH-04 MOANA

******* Total Recoverable Copper in Seawater *******

EPA Method: 200.12 / 220.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080229009	UNDOCK Kahana/Moana - Lil'Perris: Ambient Composite Water	UNK	9.3	ug/L	2/29/2008	3/17/2008
REMARKS:						
20080229009	UNDOCK Kahana/Moana - Lil'Perris: Ambient Composite Water	DUP	8.8	ug/L	2/29/2008	3/17/2008
REMARKS:						
20080229012	UNDOCK Kahana/Moana - Lil'Perris: Effluent Composite Water	UNK	53	ug/L	2/29/2008	3/17/2008
REMARKS:						
20080229017	UNDOCK Kahana/Moana - Lil'Perris: Metals Control	UNK	1.8	ug/L	2/29/2008	3/17/2008
REMARKS:						

BATCH QC/QA

Analyte Recovery (%): 100 Precision (% RPD): 1.5 System Blank: Acceptable

******* Total Recoverable Lead in Seawater *******

EPA Method: 200.15 / 239.1 / 239.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080229009	UNDOCK Kahana/Moana - Lil'Perris: Ambient Composite Water	UNK	< 24	ug/L	2/29/2008	3/13/2008
REMARKS:						
20080229009	UNDOCK Kahana/Moana - Lil'Perris: Ambient Composite Water	DUP	< 24	ug/L	2/29/2008	3/13/2008
REMARKS:						
20080229012	UNDOCK Kahana/Moana - Lil'Perris: Effluent Composite Water	UNK	< 18	ug/L	2/29/2008	3/13/2008
REMARKS:						
20080229017	UNDOCK Kahana/Moana - Lil'Perris: Metals Control	UNK	< 15	ug/L	2/29/2008	3/13/2008
REMARKS:						

BATCH QC/QA

Analyte Recovery (%): 100 Precision (% RPD): 21 System Blank: Acceptable

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03/25/2008 13:16 8082352847 INALAB/KENCH/ID PAGE 05

Mr. Bill McCarthy
Manson, Ltd.
91-807 Makakilo Road

Kapolei HI 96707

Phone Number: (808) 682-1333
Facsimile: (808) 682-5846

Analytical Results

INALAB JOB NO: 20080366
CLIENT REFERENCE: PO#: 78357 (2/28/08) ABI204 KAHANA,ABH-04 MOANA

******* Total Recoverable Zinc in Seawater *******

EPA Method: 200.12 / 289.1 / 289.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080229009	UNDOCK Kahana/Moana - LiPerrin: Ambient Composite Water	UNK	24	ug/L	2/29/2008	3/13/2008
REMARKS:						
20080229009	UNDOCK Kahana/Moana - LiPerrin: Ambient Composite Water	DUP	24	ug/L	2/29/2008	3/13/2008
REMARKS:						
20080229012	UNDOCK Kahana/Moana - LiPerrin: Effluent Composite Water	UNK	100	ug/L	2/29/2008	3/13/2008
REMARKS:						
20080229017	UNDOCK Kahana/Moana - LiPerrin: Matrix Control	UNK	13	ug/L	2/29/2008	3/13/2008
REMARKS:						

BATCH QC/QA
Analyte Recovery (%): 91 Precision (% RPD): 11 System Blank: Acceptable

******* Total Suspended Solids Dried at 103-105°C *******

SMWW Method: 2540 D

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080229010	UNDOCK Kahana/Moana - LiPerrin: Ambient Composite Water	UNK	3.7	mg/L	2/29/2008	3/3/2008
REMARKS:						
20080229010	UNDOCK Kahana/Moana - LiPerrin: Ambient Composite Water	DUP	3.1	mg/L	2/29/2008	3/3/2008
REMARKS:						
20080229013	UNDOCK Kahana/Moana - LiPerrin: Effluent Composite Water	UNK	4.2	mg/L	2/29/2008	3/3/2008
REMARKS:						

BATCH QC/QA:
Analyte Recovery (%): N/A Precision (% RPD): 13 System Blank: Acceptable

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INALAB/HONOLULU 808/396-7 91:ET 8882/52/E0

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: MARISCO LTD
ADDRESS: 91-607 MALAKOLE RD
KAPOLEI, HI 96707

FACILITY: "U.S." PERRIS FLOATING DRY DOCK
LOCATION: 91-607 MALAKOLE RD
KAPOLEI, HI 96707

HI0021786	001A
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	08	05	01	TO	08	05	31

DMR MAILING ZIP CODE: 96707
MINOR

Harbor water flowing off drydock during lowering
External Outfall

No Discharge ☐

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
pH	SAMPLE MEASUREMENT	----	----		8.0	----	8.0			3/31	
00400 1 0 Effluent Gross	PERMIT REQUIREMENT	----	----		MINIMUM	----	MAXIMUM	su		Once per Discharge	GRAB
Solids, total suspended	SAMPLE MEASUREMENT	----	----		----	----	27			3/31	
00530 1 0 Effluent Gross	PERMIT REQUIREMENT	----	----		----	----	30 DAILY MAX	mg/L		Once per Discharge	COMP-24
Solids, settleable	SAMPLE MEASUREMENT	----	----		----	----	<0.1			3/31	
00545 1 0 Effluent Gross	PERMIT REQUIREMENT	----	----		----	----	1.0 Mo. DAILY MAX	mL/L		Once per Discharge	COMP-24
Arsenic, total recoverable	SAMPLE MEASUREMENT	----	----		----	----	2			3/31	
00978 1 0 Effluent Gross	PERMIT REQUIREMENT	----	----		----	----	68 DAILY MAX	ug/L		Once per Discharge	COMP-24
Zinc, total recoverable	SAMPLE MEASUREMENT	----	----		----	----	510			3/31	
01094 1 0 Effluent Gross	PERMIT REQUIREMENT	----	----		----	----	95 DAILY MAX	ug/L		Once per Discharge	COMP-24
Cadmium, total recoverable	SAMPLE MEASUREMENT	----	----		----	----	<5.1			3/31	
01113 1 0 Effluent Gross	PERMIT REQUIREMENT	----	----		----	----	15 DAILY MAX	ug/L		Once per Discharge	COMP-24
Lead, total recoverable	SAMPLE MEASUREMENT	----	----		----	----	<30			3/31	
01114 1 0 Effluent Gross	PERMIT REQUIREMENT	----	----		----	----	140 DAILY MAX	ug/L		Once per Discharge	COMP-24

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	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 persons 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.		TELEPHONE		DATE		
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

NOTE: ZINC ON 5/19/08 @ 590 ug/L - Permit Limit 95

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

Page 2

NAME: MARISCO LTD
ADDRESS: 91-507 MALAKOLE RD
KAPOLEI, HI 96707

FACILITY: "LIL" PERRIS FLOATING DRYDOCK
LOCATION: 91-507 MALAKOLE RD
KAPOLEI, HI 96707

HI0021789	001A
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	08	05	01	TO	08	05	31

DMR MAILING ZIP CODE: 96707
Marisco

Harbor water flowing off drydock during lowering
External Outfall

No Discharge ☐

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX.	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Chromium, total recoverable	SAMPLE MEASUREMENT	----	----		----	----	<29			3/31	
01118 1 0 Effluent Gross	PERMIT REQUIREMENT	----	----		----	----	---- DAILY MX	ug/L		DOM FOR DISCHARGE	DOM FOR DISCHARGE
Copper, total recoverable	SAMPLE MEASUREMENT	----	----		----	----	1300			3/31	
01119 1 0 Effluent Gross	PERMIT REQUIREMENT	----	----		----	----	---- DAILY MX	ug/L		DOM FOR DISCHARGE	DOM FOR DISCHARGE
Oil and grease	SAMPLE MEASUREMENT	----	----		----	----	<5			3/31	
00552 1 0 Effluent Gross	PERMIT REQUIREMENT	----	----		----	----	---- DAILY MX	mg/L		DOM FOR DISCHARGE	DOM FOR DISCHARGE
Tributyltin, Total Recoverable	SAMPLE MEASUREMENT	----	----		----	----	NA			3/31	
61515 1 0 Effluent Gross	PERMIT REQUIREMENT	----	----		----	----	---- DAILY MX	ug/L		DOM FOR DISCHARGE	DOM FOR DISCHARGE
Mercury, total recoverable	SAMPLE MEASUREMENT	----	----		----	----	<1.1			3/31	
71901 1 0 Effluent Gross	PERMIT REQUIREMENT	----	----		----	----	---- DAILY MX	ug/L		DOM FOR DISCHARGE	DOM FOR DISCHARGE
Flow	SAMPLE MEASUREMENT	----	2.776	MGD	----	----	----			3/31	
74076 1 0 Effluent Gross	PERMIT REQUIREMENT	----	----	gpd	----	----	----			DOM FOR DISCHARGE	DOM FOR DISCHARGE

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER			TELEPHONE		DATE		
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

NOTE: Copper on 5/27/08 @ 1300 - Permit Limit 2.9

EPA Form 3320-1 (Revised 9/99) Previous editions may be used.

Mr. Bill McCaffery
Marisco, Ltd.
91-507 Malakole Road

Kapolei HI 96707

Phone Number: (808) 682-1333
Facsimile: (808) 682-5884

Analytical Results

INALAB JOB NO: 20080753
CLIENT REFERENCE: UNDOCK STAR OF HONOLULU

******* Total Recoverable Copper in Seawater *******

EPA Method: 200.12 / 220.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080505001	Star of Honolulu - Lil Perris - Ambient Composite Water (As; Cd; Cr; Cu;Pb; Hg; Zn)	UNK	8.4	ug/L	5/2/2008	5/20/2008
REMARKS:						
20080505004	Star of Honolulu - Lil Perris - Effluent Composite Water (As; Cd; Cr; Cu;Pb; Hg; Zn)	UNK	42	ug/L	5/2/2008	5/20/2008
REMARKS:						
20080505009	Star of Honolulu - Lil Perris - Metals Control (As; Cd; Cr; Cu;Pb; Hg; Zn)	UNK	1.8	ug/L	5/2/2008	5/20/2008
REMARKS:						

BATCH QC/QA
Analyte Recovery (%): 89 **Precision (% RPD):** <1 **System Blank:** Acceptable

******* Total Recoverable Lead in Seawater *******

EPA Method: 200.12 / 239.1 / 239.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080505001	Star of Honolulu - Lil Perris - Ambient Composite Water (As; Cd; Cr; Cu;Pb; Hg; Zn)	UNK	< .33	ug/L	5/2/2008	5/20/2008
REMARKS:						
20080505004	Star of Honolulu - Lil Perris - Effluent Composite Water (As; Cd; Cr; Cu;Pb; Hg; Zn)	UNK	< .13	ug/L	5/2/2008	5/20/2008
REMARKS:						
20080505009	Star of Honolulu - Lil Perris - Metals Control (As; Cd; Cr; Cu;Pb; Hg; Zn)	UNK	< 7.5	ug/L	5/2/2008	5/20/2008
REMARKS:						

BATCH QC/QA
Analyte Recovery (%): 68 **Precision (% RPD):** <1 **System Blank:** Acceptable

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Mr. McCartney
Mililani, HI
91-537 Makaala Road

Phone Number: (808) 682-1333
Facsimile: (808) 682-5848

Rapolei HI 96707

Analytical Results

INALAB JOB NO: 20080753
CLIENT REFERENCE: UNDOCK STAR OF HONOLULU

******* Total Recoverable Zinc in Seawater *******

EPA Method: 200.12 / 289.1 / 289.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080505001	Star of Honolulu - Lil Perris - Ambient Composite Water (As; Cd; Cr; Cu;Pb; Hg; Zn)	UNK	51	ug/L	5/2/2008	5/20/2008
REMARKS:						
20080505004	Star of Honolulu - Lil Perris - Effluent Composite Water (As; Cd; Cr; Cu;Pb; Hg; Zn)	UNK	27	ug/L	5/2/2008	5/20/2008
REMARKS:						
20080505009	Star of Honolulu - Lil Perris - Metals Control (As; Cd; Cr; Cu;Pb; Hg; Zn)	UNK	27	ug/L	5/2/2008	5/20/2008
REMARKS:						

BATCH QC/QA
Analyte Recovery (%): 100 Precision (% RPD): <1 System Blank: Acceptable

******* Total Suspended Solids Dried at 103-105°C *******

SMWW Method: 2540 D

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080505002	Star of Honolulu - Lil Perris - Ambient Composite Water (TSS)	UNK	< 1	mg/L	5/2/2008	5/5/2008
REMARKS:						
20080505005	Star of Honolulu - Lil Perris - Effluent Composite Water (TSS)	UNK	< 1	mg/L	5/2/2008	5/5/2008
REMARKS:						

BATCH QC/QA
Analyte Recovery (%): N/A Precision (% RPD): 20 System Blank: Acceptable

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Mr. Bill McCaffrey
Marisco, Ltd.
91-607 Malakole Road

Kapolei HI 96707

Phone Number: (808) 682-1333
Facsimile: (808) 682-5646

Analytical Results

INALAB JOB NO: 20080574
CLIENT REFERENCE: P.O. 879177 - ABC-04 (9/19/08) - LIL PERRIS

******* Total Recoverable Copper in Seawater *******

EPA Method: 200.12 / 220.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080519062	UNDOCK MIKIDI - Lil Perris - Ambient Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	9.9	ug/L	5/19/2008	5/23/2008
REMARKS:						
20080519065	UNDOCK MIKIDI - Lil Perris - Effluent Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	180	ug/L	5/19/2008	5/23/2008
REMARKS:						
20080519070	UNDOCK MIKIDI - Lil Perris - Matala Control (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	1.7	ug/L	5/19/2008	5/23/2008
REMARKS:						

BATCH QC/QA
Analyte Recovery (%): 99 Precision (% RPD): <1 System Blank: Acceptable

******* Total Recoverable Lead in Seawater *******

EPA Method: 200.12 / 239.1 / 239.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080519062	UNDOCK MIKIDI - Lil Perris - Ambient Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 23	ug/L	5/19/2008	5/23/2008
REMARKS:						
20080519065	UNDOCK MIKIDI - Lil Perris - Effluent Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 22	ug/L	5/19/2008	5/23/2008
REMARKS:						
20080519070	UNDOCK MIKIDI - Lil Perris - Matala Control (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 24	ug/L	5/19/2008	5/23/2008
REMARKS:						

BATCH QC/QA
Analyte Recovery (%): 98 Precision (% RPD): <1 System Blank: Acceptable

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Dr. Bill McCaffery
Mililani, HI
91-607 Malaloha Road

Kapolei HI 96707

Phone Number: (808) 682-1133
Facsimile: (808) 682-5842

Analytical Results

INALAB JOB NO: 20080874
CLIENT REFERENCE: P.O. #79177 - ABC-04 (5/19/08) - LIL PERRIS

******* Total Recoverable Zinc in Seawater *******

EPA Method: 200.12 / 289.1 / 289.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080519062	UNDOCK MIKI'OI - Lil Perris - Ambient Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	68	ug/L	5/19/2008	5/23/2008
REMARKS:						
20080519065	UNDOCK MIKI'OI - Lil Perris - Effluent Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	510	ug/L	5/19/2008	5/23/2008
REMARKS:						
20080519070	UNDOCK MIKI'OI - Lil Perris - Metals Control (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 4.9	ug/L	5/19/2008	5/23/2008
REMARKS:						

BATCH QC/QA
Analyte Recovery (%): 100 Precision (% RPD): <1 System Blank: Acceptable

******* Total Suspended Solids Dried at 103-105°C *******

SMWW Method: 2540 D

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080519063	UNDOCK MIKI'OI - Lil Perris - Ambient Composite Water (TSS)	UNK	4	mg/L	5/19/2008	5/20/2008
REMARKS:						
20080519066	UNDOCK MIKI'OI - Lil Perris - Effluent Composite Water (TSS)	UNK	27	mg/L	5/19/2008	5/20/2008
REMARKS:						

BATCH QC/QA
Analyte Recovery (%): N/A Precision (% RPD): 33 System Blank: Acceptable

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Mr. Bill McCallery
Malcolm LLC
91-087 Malokiloa Road

Kapolei HI 96707

Phone Number: (808) 682-1333
Facsimile: (808) 682-5845

Analytical Results

INALAB JOB NO: 20080513

CLIENT REFERENCE: P.O. #78240; ABQ18 / APB-09 - Lil Perris (5/27/08) - UNDOCK Tiger 3

******* Total Recoverable Copper in Seawater *******

EPA Method: 200.12 / 220.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080527044	1: Lil Perris - Ambient Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	26	ug/L	5/27/2008	6/3/2008
REMARKS:						
20080527044	1: Lil Perris - Ambient Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	DUP	23	ug/L	5/27/2008	6/3/2008
REMARKS:						
20080527047	4: Lil Perris - Effluent Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	1300	ug/L	5/27/2008	6/3/2008
REMARKS:						
20080527052	9: Lil Perris - METAL CONTROL (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 1.3	ug/L	5/27/2008	6/3/2008
REMARKS:						

BATCH QC/QA

Analyte Recovery (%): 100 Precision (% RPD): <1 System Blank: Acceptable

******* Total Recoverable Lead in Seawater *******

EPA Method: 200.12 / 239.1 / 239.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080527044	1: Lil Perris - Ambient Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 37	ug/L	5/27/2008	6/3/2008
REMARKS:						
20080527044	1: Lil Perris - Ambient Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	DUP	< 37	ug/L	5/27/2008	6/3/2008
REMARKS:						
20080527047	4: Lil Perris - Effluent Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 30	ug/L	5/27/2008	6/3/2008
REMARKS:						
20080527052	9: Lil Perris - METAL CONTROL (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	34	ug/L	5/27/2008	6/3/2008
REMARKS:						

BATCH QC/QA

Analyte Recovery (%): 110 Precision (% RPD): <1 System Blank: Acceptable

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06/28/2008 15:24 8087350847 INALAB/HONOLULU PAGE 05

Mr. Bill McCafferty
Marine, Ltd.
[illegible] Avenue Road

Phone Number: (808) 622-1131
Facsimile: (808) 682-5844

Kapolei HI 96707

Analytical Results

INALAB JOB NO. 20080913

CLIENT REFERENCE: P.O. #79240: ABQ18 / APB-09 - Lil Perris (5/27/08) - UNDOCK Tiger 3

******* Total Recoverable Zinc in Seawater *******

EPA Method: 200.12 / 289.1 / 289.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080527044	1: Lil Perris - Ambient Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	48	ug/L	5/27/2008	6/3/2008
REMARKS:						
20080527044	1: Lil Perris - Ambient Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	DUP	49	ug/L	5/27/2008	6/3/2008
REMARKS:						
20080527047	4: Lil Perris - Effluent Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	400	ug/L	5/27/2008	6/3/2008
REMARKS:						
20080527052	9: Lil Perris - METAL CONTROL (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 3.5	ug/L	5/27/2008	6/3/2008
REMARKS:						

BATCH QC/QA

Analyte Recovery (%): 100 Precision (% RPD): <1 System Blank: Acceptable

******* Total Suspended Solids Dried at 103-105°C *******

SMWW Method: 2540 D

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080527045	2: Lil Perris - Ambient Composite Water (TSS)	UNK	2.9	mg/L	5/27/2008	6/2/2008
REMARKS:						
20080527048	5: Lil Perris - Effluent Composite Water (TSS)	UNK	<7	mg/L	5/27/2008	6/2/2008
REMARKS:						

BATCH QC/QA

Analyte Recovery (%): N/A Precision (% RPD): 3.1 System Blank: Acceptable

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NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved.
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: MARISCO LTD
ADDRESS: 91-007 MALAKOLE RD
KAPOLEI, HI 96707

FACILITY: "LE" PERRIN FLOATING DRYDOCK
LOCATION: 91-007 MALAKOLE RD
KAPOLEI, HI 96707

HI0021788	002A
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	08	06	01	TO	08	06	30

Page 1

DMR MAILING ZIP CODE 96707
MINOR

Harbor water flowing off drydock during diversion
External Outfall

No Discharge ☐

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Chromium, total recoverable	SAMPLE MEASUREMENT	-----	-----		-----	-----	<33			2/30	
01116 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	110 MO AVG / 220 DAILY MAX	ug/L		Once Per Discharge	COMPOS
Copper, total recoverable	SAMPLE MEASUREMENT	-----	-----		-----	-----	70			2/30	
01119 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	27 MO AVG / 54 DAILY MAX	ug/L		Once Per Discharge	COMPOS
Oil and grease	SAMPLE MEASUREMENT	-----	-----		-----	-----	<5			2/30	
00552 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	15 DAILY MAX	mg/L		Once Per Discharge	GRAB
Tributyltin, Total Recoverable	SAMPLE MEASUREMENT	-----	-----		-----	-----	N/A			2/30	
51516 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	0.01 DAILY MAX	ug/L		Once Per Discharge	COMPOS
Mercury, total recoverable	SAMPLE MEASUREMENT	-----	-----		-----	-----	<1.1			2/30	
71901 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	2.1 DAILY MAX	ug/L		Once Per Discharge	COMPOS
Flow	SAMPLE MEASUREMENT	2.776	-----	MGD	-----	-----	-----			2/30	
74076 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----	MGD	-----	-----	-----			Once Per Discharge	Estimate

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER			TELEPHONE		DATE		
			AREA Code	NUMBER	YEAR	MO	DAY
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT					

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

EPA Form 3320-1 (Rev.03/99) Previous editions may be used.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: MARISCO LTD
ADDRESS: 91-607 MALAKOLE RD
KAPOLEI, HI 96707

FACILITY: "LIL" PERRIS FLOATING DRYDOCK
LOCATION: 91-607 MALAKOLE RD
KAPOLEI, HI 96707

HI0021780	002A
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	08	06	01	TO	08	06	30

DMR MAILING ZIP CODE: 96707
MINOR:

Harbor water flowing off drydock during lowering
External Outfall

No Discharge ☐

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
pH	SAMPLE MEASUREMENT	-----	-----		8.03	-----	8.03			2/30	
00400 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		----- MINIMUM	-----	----- MAXIMUM	SU		Once per Discharge	GRAB
Solids, total suspended	SAMPLE MEASUREMENT	-----	-----		-----	-----	8.8			2/30	
00530 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	----- DAILY MAX	mg/L		Once per Discharge	COMP
Solids, settleable	SAMPLE MEASUREMENT	-----	-----		-----	-----	<0.1			2/30	
00545 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	----- DAILY MAX	mL/L		Once per Discharge	COMP
Arsenic, total recoverable	SAMPLE MEASUREMENT	-----	-----		-----	-----	2.6			2/30	
00978 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	----- DAILY MAX	ug/L		Once per Discharge	COMP
Zinc, total recoverable	SAMPLE MEASUREMENT	-----	-----		-----	-----	200			2/30	
01094 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	----- DAILY MAX	ug/L		Once per Discharge	COMP
Cadmium, total recoverable	SAMPLE MEASUREMENT	-----	-----		-----	-----	<7			2/30	
01113 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	----- DAILY MAX	ug/L		Once per Discharge	COMP
Lead, total recoverable	SAMPLE MEASUREMENT	-----	-----		-----	-----	<34			2/30	
01114 1 0 Effluent Gross	PERMIT REQUIREMENT	-----	-----		-----	-----	----- DAILY MAX	ug/L		Once per Discharge	COMP

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER			TELEPHONE		DATE		
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

Mr. Bill McCaffery
Marisco Ltd.
91-607 Makakilo Road
Kapolei, HI 96707

Phone Number: (808) 682-1333
Facsimile: (808) 682-5848

Analytical Results

INALAB JOB NO: 20080952
CLIENT REFERENCE: ABQ-02, P.O. #79316 (6/2/08); UNDOCK - WILD THING

******* Total Recoverable Copper in Seawater *******

EPA Method: 200.12 / 220.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080603016	LIL PERRIS: Composite Water - AMBIENT (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	17	ug/L	6/3/08	6/23/08
REMARKS:						
20080603018	LIL PERRIS: Composite Water - EFFLUENT (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	190	ug/L	6/3/08	6/23/08
REMARKS:						
20080603024	LIL PERRIS: Composite Water - METALS CONTROL (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	1.2	ug/L	6/3/08	6/25/08
REMARKS:						

BATCH QC/QA:
Analyte Recovery (%): 100 Precision (% RPD): <1 System Blank: Acceptable

******* Total Recoverable Lead in Seawater *******

EPA Method: 200.12 / 239.1 / 239.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080603016	LIL PERRIS: Composite Water - AMBIENT (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 47	ug/L	6/3/08	6/23/08
REMARKS:						
20080603018	LIL PERRIS: Composite Water - EFFLUENT (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 44	ug/L	6/3/08	[illegible]
REMARKS:						
20080603024	LIL PERRIS: Composite Water - METALS CONTROL (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 44	ug/L	6/3/08	6/25/08
REMARKS:						

BATCH QC/QA:
Analyte Recovery (%): 110 Precision (% RPD): <1 System Blank: Acceptable

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Mr. Bill McCallery
Mission, Ltd.
91-407 Malakole Road

Phone Number: (808) 682-1333
Facsimile: (808) 682-5648

Kapolei, HI 96707

Analytical Results

INALAB JOB NO: 20080602
CLIENT REFERENCE: ABG-03, P.O. #79316 (6/3/08); UNDOCK - WELD THING

******* Total Recoverable Zinc in Seawater *******

EPA Method: 200.12 / 289.1 / 289.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080603016	LIL PERRIS: Composite Water - AMBIENT (As, Cd, Cr, Cu, Pb, Hg, Zn)	UNK	< 5.1	ug/L	6/3/08	6/23/08
REMARKS:						
20080603018	LIL PERRIS: Composite Water - EFFLUENT (As, Cd, Cr, Cu, Pb, Hg, Zn)	UNK	[illegible]	ug/L	6/3/08	6/23/08
REMARKS:						
20080603024	LIL PERRIS: Composite Water - METALS CONTROL (As, Cd, Cr, Cu, Pb, Hg, Zn)	UNK	< 4.7	ug/L	6/3/08	6/23/08
REMARKS:						

BATCH QC/QA
Analyte Recovery (%): 100 Precision (% RPD): <1 System Blank: Acceptable

******* Total Suspended Solids Dried at 103-105°C *******

SM2540 Method: 2540 D

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080603017	LIL PERRIS: Composite Water - AMBIENT (TSS)	UNK	2.4	mg/L	6/3/08	6/5/08
REMARKS:						
20080603023	LIL PERRIS: Composite Water - EFFLUENT (TSS)	UNK	<2	mg/L	6/3/08	6/5/08
REMARKS:						

BATCH QC/QA
Analyte Recovery (%): N/A Precision (% RPD): 40 System Blank: Acceptable

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Mr. [illegible] McCarthy
Marine, Ltd
[illegible] Meridale Road

Phone Number: (508) 692-1[illegible]
Facsimile: (508) 692-5[illegible]

Kapolei, HI 96707

Analytical Results

INALAB JOB NO: 20081008
CLIENT REFERENCE: P.O. #79394; ABU-04, UNDOCK JIMMY SMITH (8/10/08)

******* Total Recoverable Copper in Seawater *******

EPA Method: 200.12 / 220.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080810001	1 - UnDock TUG Jimmy Smith: Lil Perris - Ambient Composite Water - As; Cd; Cr; Cu; Pb; Hg; Zn	UNK	18	ug/L	8/10/2008	8/23/2008
REMARKS:						
20080810002	1 - UnDock TUG Jimmy Smith: Lil Perris - Ambient Composite Water - As; Cd; Cr; Cu; Pb; Hg; Zn	DUP	18	ug/L	8/10/2008	8/23/2008
REMARKS:						
20080810003	4 - UnDock TUG Jimmy Smith: Lil Perris - Effluent Composite Water - As; Cd; Cr; Cu; Pb; Hg; Zn	UNK	470	ug/L	8/10/2008	8/23/2008
REMARKS:						
20080810003	4 - UnDock TUG Jimmy Smith: Lil Perris - Effluent Composite Water - As; Cd; Cr; Cu; Pb; Hg; Zn	DUP	540	ug/L	8/10/2008	8/23/2008
REMARKS:						
20080810010	9 - UnDock TUG Jimmy Smith: Lil Perris - Matrix Control - As; Cd; Cr; Cu; Pb; Hg; Zn	UNK	< 1.5	ug/L	8/10/2008	8/23/2008
REMARKS:						

BATCH QC/QA

Analyte Recovery (%): 100 Precision (% RPD): <1 System Blank: Acceptable

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Mr. Bill McCaffery
Marisco Ltd.
91-607 Malakole Road

Kapolei HI 96707

Phone Number: (808) 682-1333
Facsimile: (808) 682-9844

Analytical Results

INALAB JOB NO: 20081006
CLIENT REFERENCE: P.O. #79394; ABU-04, UNDOCK JIMMY SMITH (8/10/08)

******* Total Recoverable Lead in Seawater *******

EPA Method: 200.12 / 239.1 / 239.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080610002	1 - UnDock TUG Jimmy Smith; Lil Perris - Ambient Composite Water - As; Cd; Cr; Cu; Pb; Hg; Zn	UNK	< 39	ug/L	8/10/2008	8/23/2008
REMARKS:						
20080610002	1 - UnDock TUG Jimmy Smith; Lil Perris - Ambient Composite Water - As; Cd; Cr; Cu; Pb; Hg; Zn	DUP	< 38	ug/L	8/10/2008	8/23/2008
REMARKS:						
20080610005	4 - UnDock TUG Jimmy Smith; Lil Perris - Effluent Composite Water - As; Cd; Cr; Cu; Pb; Hg; Zn	UNK	< 34	ug/L	8/10/2008	8/23/2008
REMARKS:						
20080610010	9 - UnDock TUG Jimmy Smith; Lil Perris - Metals Control - As; Cd; Cr; Cu; Pb; Hg; Zn	UNK	< 21	ug/L	8/10/2008	8/23/2008
REMARKS:						

BATCH QC/QA
Analyte Recovery (%): 91 Precision (% RPD): <1 System Blank: Acceptable

******* Total Recoverable Zinc in Seawater *******

EPA Method: 200.12 / 289.1 / 289.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080610002	1 - UnDock TUG Jimmy Smith; Lil Perris - Ambient Composite Water - As; Cd; Cr; Cu; Pb; Hg; Zn	UNK	52	ug/L	8/10/2008	8/23/2008
REMARKS:						
20080610002	1 - UnDock TUG Jimmy Smith; Lil Perris - Ambient Composite Water - As; Cd; Cr; Cu; Pb; Hg; Zn	DUP	53	ug/L	8/10/2008	8/23/2008
REMARKS:						
20080610005	4 - UnDock TUG Jimmy Smith; Lil Perris - Effluent Composite Water - As; Cd; Cr; Cu; Pb; Hg; Zn	UNK	200	ug/L	8/10/2008	8/23/2008
REMARKS:						
20080610010	9 - UnDock TUG Jimmy Smith; Lil Perris - Metals Control - As; Cd; Cr; Cu; Pb; Hg; Zn	UNK	< 2.5	ug/L	8/10/2008	8/23/2008
REMARKS:						

BATCH QC/QA
Analyte Recovery (%): 100 Precision (% RPD): <1 System Blank: Acceptable

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Mr. [illegible] McCarthy
Marine [illegible] LLC
91-[illegible] Oleanda Road
Kapolei, HI 96707

Phone Number: (808) 682-1[illegible]
Facsimile: (808) 682-5[illegible]

Analytical Results

INALAB JOB NO: 20081109

CLIENT REFERENCE: ABW-04, P.O. #79501: UNDOCK TUG KOKUA - (6/26/08)

******* Total Recoverable Copper in Seawater *******

EPA Method: 200.12 / 220.2

INALAB ID	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080623001	UnDock Tug Kokua: Lil Perris - AMBIENT Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 2.8	ug/L	6/23/2008	7/10/2008
REMARKS:						
20080623001	UnDock Tug Kokua: Lil Perris - AMBIENT Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	DUP	< 2.8	ug/L	6/23/2008	7/10/2008
REMARKS:						
20080623004	UnDock Tug Kokua: Lil Perris - EFFLUENT Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	760	ug/L	6/23/2008	7/10/2008
REMARKS:						
20080623009	UnDock Tug Kokua: Lil Perris - METALS CONTROL (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 0.3	ug/L	6/23/2008	7/10/2008
REMARKS:						

BATCH QC/QA

Analyte Recovery (%): 100 Precision (% RPD): <1 System Blank: Acceptable

******* Total Recoverable Lead in Seawater *******

EPA Method: 200.12 / 239.1 / 239.2

INALAB ID	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080623001	UnDock Tug Kokua: Lil Perris - AMBIENT Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 34	ug/L	6/23/2008	7/10/2008
REMARKS:						
20080623001	UnDock Tug Kokua: Lil Perris - AMBIENT Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	DUP	< 34	ug/L	6/23/2008	7/10/2008
REMARKS:						
20080623004	UnDock Tug Kokua: Lil Perris - EFFLUENT Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 25	ug/L	6/23/2008	7/10/2008
REMARKS:						
20080623009	UnDock Tug Kokua: Lil Perris - METALS CONTROL (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 31	ug/L	6/23/2008	7/10/2008
REMARKS:						

BATCH QC/QA

Analyte Recovery (%): 100 Precision (% RPD): <1 System Blank: Acceptable

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[illegible] 808 [illegible] [illegible] /[illegible] 61:61 8002/01/20

Mr. Bill McCaffery
Manson, LLC
91-607 Makakilo Road

Kapolei HI 96707

Phone Number: (808) 682-1313
Facsimile: (808) 682-5841

Analytical Results

INALAB JOB NO: 20081108
CLIENT REFERENCE: ABW-04, P.O. #79801: UNDOCK TUG KOKUA - (6/20/08)

******* Total Recoverable Zinc in Seawater *******

EPA Method: 200.12 / 289.1 / 289.2

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080623001	UnDock Tug Kokua: Lil Perris - AMBIENT Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	31	ug/L	6/23/2008	7/10/2008
REMARKS:						
20080623003	UnDock Tug Kokua: Lil Perris - AMBIENT Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	DUP	31	ug/L	6/23/2008	7/10/2008
REMARKS:						
20080623004	UnDock Tug Kokua: Lil Perris - EFFLUENT Composite Water (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	260	ug/L	6/23/2008	7/10/2008
REMARKS:						
20080623005	UnDock Tug Kokua: Lil Perris - METALS CONTROL (As; Cd; Cr; Cu; Pb; Hg; Zn)	UNK	< 4.2	ug/L	6/23/2008	7/10/2008
REMARKS:						

BATCH QC/QA
Analyte Recovery (%): 100 Precision (% RPD): <1 System Blank: Acceptable

******* Total Suspended Solids Dried at 103-105°C *******

SMWW Method: 2540 D

INALAB NO	Your Sample Description	Sample Type	Results	Units	Date Submitted	Date Analyzed
20080623002	UnDock Tug Kokua: Lil Perris - AMBIENT Composite Water (TSS)	UNK	3.1	mg/L	6/23/2008	6/25/2008
REMARKS:						
20080623002	UnDock Tug Kokua: Lil Perris - AMBIENT Composite Water (TSS)	DUP	5.2	mg/L	6/23/2008	6/25/2008
REMARKS:						
20080623005	UnDock Tug Kokua: Lil Perris - EFFLUENT Composite Water (TSS)	UNK	4	mg/L	6/23/2008	6/25/2008
REMARKS:						

BATCH QC/QA
Analyte Recovery (%): N/A Precision (% RPD): 52 System Blank: Acceptable

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ATTACHMENT C

It was observed in the dry dock cycling log that a cycling event occurred on August 22, 2008. Part A.1.a requires the Discharger to conduct monitoring during each dry dock cycle. The dry dock cycling log does state that monitoring occurred at the time of the cycling, however a copy of the analytical data for this monitoring event was not available for review on the date of the inspection. The Facility representative stated that a copy of the analytical data could be retrieved from the laboratory if necessary.

DATE	Action / Vessel	Scheduled cycle TIME	Actual Cycle time	Type Vessel	Comments
7/18/08	Dock YC-1485 Tug Nunui	8:30	8:50	Barge Tug	No Sample Required
8/22/08 Dates not available	UNDOCK YC-1485 Tug Nunui	8:00	8:30	Barge Tug	EFF: 8:40 AMB: 8:15
8-25-08	Dock K-O-K	8:00	8:15	UH Research	No Sample Req.
11-18-08	UNDOCK K-O-K	1300	1300	UH Research	AMB-12:45 EFF 1310
11-24-08	Dock YC-757 YC-940	11:00	11:00	Barges	No Sample Required
Late reports may add in					

ATTACHMENT D

Marisco's Best Management Practices Plan

0021786
10/25/02

MARISCO, LTD.
MARINE AND INDUSTRIAL SERVICE COMPANY

BEST MANAGEMENT PRACTICE (BMP) PLAN

NPDES PERMIT NO. HI 0021786

OCTOBER 2002
(REVISION 3)

Chapter 1. Introduction

I. Purpose of BMP Plan.

U. S. Environmental Protection Agency (EPA) and State of Hawaii, Department of Health permitted (**Attachment 1**) Marisco, Ltd. to discharge harbor water flowing off the dry dock after a lifting and lowering cycle, storm water runoff from the dry-dock area and land-based operations. Marisco, Ltd. has applied for a "Non-Contact Cooling Water Discharge" permit, this permit will allow Marisco to discharge cooling water from vessels in dry dock. (**attachment 4**) Marisco will submit a monthly report to EPA and Clean Water Branch, State Department of Health according to the permit requirements and implement a Best Management Practice Plan. The purpose of the BMP plan is to reduce the amount the pollutants and potential hazards to the minimum through engineering, administrative controls in order to protect ambient water quality. The permit covers both the dry-dock area as well as the land base operations around the dry-dock, excluding any potential pollutants that may come from other outdoor activities or atmospheric deposits, for which we have no control over and/or are directly responsible.

40 CFR and State Of Hawaii "Standard NPDES Permit Conditions" require all NPDES permitees to submit a BMP plan. The plan shall be kept on the premises at the office of the Environmental Compliance Manager.

II. Implementation Committee

The permit requires the implementation of the BMP plan in controlling the discharge pollutants from the permitted area. Marisco, Ltd. has formed a standing committee that will oversee the implementation of the plan. The committee will be led by Operation Manager and also include Administrative Manager, Environmental Compliance Manager, Safety Officer and general foreman from each department.

III. Updating the BMP Plan.

Marisco Ltd. will always strive for a Best Management Plan that is most able to reduce potential pollution. EPA and State Department of Health will be promptly notified at any activity change that requires an alteration of out BMP Plan.

Chapter 4. Steps to Reduce Pollution - Best Management Practice

Mariaco Ltd. proposes the following measures and controls to accomplish best management practice as required by the permit to "address all specific means of controlling the discharge of pollutants from the Mariaco, Ltd." All dry dock area shall always be kept in a clean and orderly manner, which has been and will always be the baseline measure for pollution prevention. More specifically, the following areas are specially addressed:

Prohibition of Non-Storm Water Discharge

- The permit only authorizes Mariaco Ltd. to discharge harbor water flowing off the dry dock after a lifting and lowering cycle as well as storm water runoff from the dry-dock area and land-based operations. Non-storm water such as bilge and ballast water, sanitary/sewage from vessels are not covered in the permit. Therefore, non-storm water shall be transferred directly to a holding tank or vacuum truck. In addition, steam cleaning will not be performed on the dry dock and trained operators shall only perform tank pumping. All hoses used for transferring liquids will be hydro-tested annually.

- The disposal of M.E. heat exchanger hydro-test water and other wastewater generated while the vessel is in dry-dock into the vessel or dry dock's bilge and/or ballast tank is prohibited. Wastewater not covered under this, but NPDES permit, including, but not limited to low pressure cleaning water, ultra-high pressure water blasting, M.E. heat exchanger hydro-test water, hose hydro-test water will be properly disposed and will not be discharged into Barbers point Harbor.

Non-Contact Cooling Water Discharge

- Mariaco, Ltd. is permitted to discharge 'non-contact' cooling water from vessels when they are in dry-dock. The discharge of any non-contact cooling water will be discharged at any of the four discharge located on port or starboard sides of the dry-dock. Any vessel that will have any type of non-contact cooling discharge, will comply to the permit requirements.**(attachment 04)**

- The hoses used for overboard discharge connections will be clamped and secured to ensure that none of them leak or allow the discharge to come into contact with the dry-dock. Hoses or hard pipe will be utilized to run the "non-contact cooling water discharge" to one of any discharge location, designated on our NPDES permit.

Low –pressure/Low volume cleaning

- Low- pressure cleaning is used to remove marine growth. Liquids from the low-pressure/low-volume cleaning wash shall be contained within the dry-dock pontoon deck to prevent the discharge from flowing off dry-dock. All liquids that are generated by the 'low-pressure/low-volume' cleaning will be contained in the dry-dock pontoon area.

- The pontoon or deck area of the dry dock has a 4" berm on the foreword and after ends, this will contain any and all liquids that area generated by this cleaning procedure in addition "Mariaco shall pump and vacuum up liquids generated from this process". The discharge will be "pumped" into temporary holding tanks (poly or steel tanks), where it will be held, tested and sent to a permitted water treatment facility for proper disposal. Any remaining the debris will be broom swept and vacuumed and placed in covered containers ("super sacks") for disposal. Therefore, in this case, improving and maintaining the dry-dock clean and in order is the best management practice to reduce potential pollution sources.

- There are no additives or chemicals that are added to the water at any time, the SPCC and NACE cleaning standards do not allow for any 'chemical' additive to be applied.

- The amount or volume of liquid that is generated depends on the size and square footage of the vessel that needs to be cleaned, and the condition of the underwater hull it self. A flow rate of 4 gallons per minute and 4,000 PSI, we will generate less than 2,000 gallons per day

Ultra-High Pressure Water Blasting

- All liquids that are generated by the 'ultra-high pressure' cleaning will be contained in the dry-dock pontoon area. The pontoon or deck area of the dry dock has a 4" berm on the foreword and after ends, this will contain any and all liquids that area generated by this cleaning procedure.

- Ultra-high water blasting will be contained in the dry-dock area basin and pumped into temporary holding tanks (poly or steel 'frac' tanks), where it will be held, tested and sent to a permitted water treatment facility (Unitek or Phillip Services) for proper disposal. Any remaining debris will be broom swept and vacuumed and placed in covered containers ("super sacks") for disposal. Therefore, in this case, improving and maintaining the dry-dock in a clean and orderly manner is the best management practice to reduce potential pollution sources.

- There are no additives or chemicals that are added to the water at any time, the SPCC and NACE cleaning standards do not allow for any 'chemical' additive to be applied.

- The amount or volume of liquid that is generated depends on the size and square footage of the vessel that needs to be cleaned, and the condition of the underwater hull it self. A flow rate of 6 gallons per minute and 40,000 PSI, we will generate less than 2,000 gallons per day during an 8-hour period.

Scuppers

- Not applicable. This dry-dock has no scuppers of any kind in its construction.

Blasting and Painting areas

- To the maximum extent possible, all blasting and painting activities must be sufficiently contained to prevent abrasives, paint chips and over spray from reaching receiving water. All sandblasters and painters shall be trained in proper techniques.

- As shown in Attachment 2, the vessels are usually at least 25 feet from the both ends of the dry dock and 50 feet-tall steel wing walls on both sides of the dry dock serve naturally as containment to prevent or minimize the discharge of spent abrasive, paint chips and paint into the receiving water. Under windy conditions, any uncontained blasting and painting shall be prohibited; or plastic barriers or tarpaulins shall be hung up to minimize the discharge of spent abrasives and paint chips.

- Preventive measures to be taken to prevent any sandblast grit, paint or other contaminants are to be strictly adhered to. Tarpaulins will be placed at each end of the dry dock, draped across the width of the dry dock and to be secured/anchored at the bottom and sides. When necessary, and the scope of work require it, the use of 'shrink wrap' will be employed. The 'shrink wrap' will be placed around any structure that extends above the dry-dock wing walls or the conditions of the application of protective coatings may require the 'shrink wrap', (e.g. weather, removal of protective coatings, finish coat application).

- Spent sandblasting grit, removed marine growth and old hull paints and debris will be swept to a "broom clean" and "vacuumed" daily or as soon as the task is finished, or **whichever is earlier**, and packed into nylon or steel container and removed away from the dry dock. Solids composite samples will be taken from the bags to determine the characteristics of the spent materials and then disposed accordingly.

- Before the dry-dock is lowered into the water, the entire dry dock will be cleaned and all 'hard to reach areas' (broomed swept and vacuumed) of all trash, abrasives and debris that could possibly contaminate the harbor.

- All amounts of sandblast grit that are used or otherwise associated with each particular job will be measured and recorded on a daily basis. The sandblast "hoppers" will be measured manually and a calculation of the volume will determine the amount of sandblast used per "hopper". Each bag of spent sandblast grit will be weighed to determine the amounts (pounds/tons) of recovered grit were used. All measurements shall be recorded daily into the facility's Sandblast Grit Usage Log.

- Vacuuming of the dry-dock will be accomplished to remove marine growth, spent sandblast grit any removed marine protective coating and other debris as soon as possible, after the task is completed and before the dry-dock is cycled. Vacuuming and sweeping will be done to access the hard to reach areas of the dry-dock, around the keel blocks and side-block tracks on the pontoon area.

- In the case of storm water, the above procedure shall keep the dry dock in a condition that the rainwater will carry no contaminants from the dock into the harbor.

- No lead-based paint will be applied on Marisco Ltd. Dry dock. If possible, painting job shall be performed on land in contained painting booth. When necessary, containment shall be set up to prevent over spray and dripping. Spray during windy conditions or over open water is prohibited. Only quantities of paints necessary to complete the job will be allowed in the dry dock area.

- There shall always be absorbent and other cleanup items readily available for immediate clean up of spills. Should there be a paint spill, the area will be isolated and contained. The bulk of paint shall be scooped back into containers, closed and removed from the dry dock. The remainder will be wiped with rags and the appropriate thinner or solvent. The residue will dry out on the steel deck.

- All spent thinners and paints will be accumulated in proper D.O.T. containers and disposed of according to Marisco, ltd. "Haz-Waste Management Plan".

- Mix paints and solvents in designated areas away from dry dock or near surface water. If possible, mix paints indoors or under a shed.

- An appropriate 'paint locker' will be placed on the dry-dock pontoon area to store all cans of new paints and thinners, also all empty paint containers will be accumulated and place in the 'paint locker' until ready for disposal.
- All empty cans to dry before disposal. Recycle paints, paint thinners and solvents. Keep paints from traffic areas to avoid spills.

Storage, Empty paints Containers/Waste

- Storage of all empty paint containers will be kept in water tight 'paint lockers' to prevent any releases to dry –dock pontoon area and state waters. This will be utilized as an area where all empty paint cans and drums containing 'wastes' can be temporarily stored until they are ready for disposal, by the appropriate disposal contractor. Empty cans with residuals will be 'air' dried or solidified and stored there until cans are properly disposed. Any can of paint or thinner that can not be recycled or used will be collected into the appropriate drum for future disposal.

Engine repair areas

- In order to prevent pollution to the dry dock are, most maintenance activities shall be performed indoors in the machine shop. Draining of all equipment fluids will be accomplished prior to moving off site. Any draining/transferring of 'liquids' to done in the dry dock area will be

accomplished under our U.S Coast Guard (33 CFR) "Mobile Facility Operations Manual" requirements and guidelines to prevent any oil, or other liquids from entering navigable waters.

Equipment on dry-dock

- All equipment (man lifts, forklifts, etc.) that is to be utilized will be pre-inspected to assure that it has no major leaks of any sort, (motor oil, hydraulic oil, fuel, etc.). Should any equipment develop any type of leak it will be immediately put out of service and repaired, placed on some sort of containment to prevent any pollutants from entering harbor waters, or taken out of dry-dock area for repairs.

- Should there be a release or leak of any oil or petroleum product, resulting from equipment that is utilized on the dry-dock pontoon deck must be cleaned immediately.

Dry dock areas/Clean-up, Removal of Debris and Sandblast Grit

- On the dry dock, all spent sandblasting grit, removed marine growth and old hull paints and debris will be swept to a "broom clean" and "vacuumed" daily or as soon as the task is finished, and packed into nylon container and removed away from the dry dock. Solids composite samples will be taken from the bags to determine the characteristics of the spent materials and then disposed accordingly.

- Before any vessel is unlocked, the entire dry dock will be swept and vacuumed cleaned of all trash, abrasives and debris that could possibly contaminate the harbor. All side-block tracks and 'hard to reach'/'ridges' of pontoon deck areas will be vacuumed to remove spent sandblast grit and other debris where sweeping is ineffective.

- All spent sandblast grit will be placed in "super sacks", all the "super sacks" will be placed on pallets. Each "sack" will have its "flaps" tied to prevent any spent sandblast grit from being exposed to the elements. The "sacks" will be covered with visqueen/plastic sheathing. No employee shall place spent sandblast grit & debris on bare ground.

- All debris, trash or other rubbish,(other than sandblast grit) will be placed in roll off containers, to be hauled and disposed of by a waste hauler contracted by Marisco, ltd..

- The "wing walls" of the dry dock will be swept or vacuumed, debris, loose rust or sandblast grit will be removed prior to any cycling evolution of the dry-dock. Any rust on the dry dock wing walls will be one of are ongoing maintenance procedures, for the up-keeping of the dry-dock.

Employee training

- Marisco Ltd. has on-going training program year round to comply with local and Federal regulations. All employees will have at least 8 hour training on hazardous waste management, spill prevention and control in addition to their regular technical training on good housekeeping, sandblasting and painting, etc. Employees, independent contractors and customers shall be informed about measures in BMPs Plan and will be required to perform in accordance with these practices.

Inspection and Record keeping

- Each dry dock lowering and lifting procedure, inspection, sampling detail and test result shall be properly logged in and kept in the Environmental Compliance Manager's office.

- Inspection: The dry dock operation and housekeeping is constantly under the inspection and supervision of the Safety Officer and the appropriate trade supervisors. The committee will do quarterly inspections to ensure all measurements of BMP's plan are well implemented and maintained. All required records shall be kept according to permit requirements.

- All logs concerning the sandblast grit used and recovered, chain of custody forms, and employee training records and other documents will be properly maintained in the office of the Environmental Compliance Manager.

- All records concerning NPDES permit HI0021786 will be kept for a minimum of (5) five years and be available for inspection by Federal and State of Hawaii personnel.

- The dry-dock will be inspected by the Environmental Compliance Manager, the Safety Officer and all other trades, to ensure that all areas of concern are taken care of, (e.g. clean up any oil stains, sweep up any small amount of spent sandblast grit left). Assure and prevent any potential pollutant source that might enter state harbor waters.

Monitoring

- The effluents shall be sampled and tested according to the permit requirement (See Attachment 1) at each lifting and lowering cycle, and at least annually for storm water. Details can be found in Effluent Monitoring Program.

- Monthly Discharge Reports shall be sent to State Department of Health, Clean Water Branch and U. S. Environmental Protection Agency, Water Management Division by the 28th of each month.

Spill Clean up

- In the event of any spill from work being conducted on the dry dock by trades, (pipe fitters, mechanics or painters) or the type of liquids that are spilled, (hydraulic oil, fuel, paints or thinners) immediate action will be taken.

- The following protocol will be implemented and closely adhered to for any type of spill that occurs on the dry dock area, **(see Attachment 3)**

Land Based Operations

- All locations around the dry-dock land operations will adhere to the BMP issues stated. Marisco will take all necessary precautions such as providing containment of fuel when left on-sight, sand blast grit new or spent will be covered. Spill pallets will be on-sight and used, spill kits will be located on the dry-dock as well as the land based operations and were there is a possibility of a spill occurring.

- Should there be any spill on the ground surface, it will be contained immediately, reported to proper authorities, if it is a reportable quantity, and cleaned. Dirt or ground soil will be removed, (shoveled) until there is no visible trace of product. The removed product will be placed in the appropriate D.O.T. container and disposed in accordance with all local, state and federal regulations.

Chapter 2. Site location and general Environment

The NPDES permit (No. HI 0021786) covers the land area and dry dock area in Marisco Ltd. We hereby provide some general information about this area that is considered valuable to the public.

I. The General nature of Facility Activity.

The primary task Marisco Ltd. performs is ship repair and maintenance. The dry dock is cycled through a lowering and lifting procedure to accommodate ship repairs below waterline. The general repair or maintenance job involves tank cleaning, sandblasting, painting, welding, and other mechanic work.

II. Map of the facility layout and general Environment.

Attachment 2 Shows the facility, the layout of the area immediately surrounding it, and the general plan for the dry-dock.

The facility is located at the Northeast quadrant of the Harbor.

The receiving water is from Barber's Point Harbor through its Outfall Serial No. 001 through 006, at coordinates: Latitude 21°10'00"N; Longitude 157°12'00"W.

Outfall Description:
Lowering: 001
Lifting: 002

Storm water Runoff from dry-dock area:
003, 004

Storm water Runoff from land based operations:
005, 006

Non-Contact Cooling Water Discharge:
007, 008, 009, 010

Chapter 3. Description of potential sources of pollution

(Attachment 2) Shows the dry-dock layout. Site activities such as sandblasting, painting and mechanical repairs mostly happen between the two wing walls.

No liquids or materials are stored on the dry dock area. Only the amount of paints or abrasives required for daily job is transferred into the dry dock. Therefore, potential pollution sources are mainly from sandblasting and painting. The following worksheet lists various activities and materials involved in the operation which could potentially become contaminants.

Table 1. List of pollutants with a reasonable potential to be present in effluent in significant quantities

- **Surface preparation:**

Process involves low-pressure water cleaning, ultra high surface water blasting and sandblasting. Any residual waste consists of spent sandblast grit with paint chips and wastewater generated during low-pressure water cleaning and marine growth.

- **Painting:**

Process involves the application of Marine coatings to the exterior of ship hulls after sandblasting or the removal of marine growth. Residual waste will consist of empty paint containers, paints, thinners and masking material.

- **Metal plating and surface finishing:**

Marisco, ltd. does not provide these types of services or conduct this type of operation.

- **Machining and Metal working:**

All machining and metalworking is performed indoors in our machine shop. The only exception is on occasions when shaft housings must be bored in place. In those cases cutting, grinding and boring must be accomplished. Area of work will have containment around and under. Waste generated will consist of degreasers and cutting oils.

- **Solvent cleaning and degreasing:**

Process involves utilizing water based, 'environmentally safe' solvents that contain low or no chlorinated solvents. Residual waste such as solvents, rags and containers are the only waste generated.

- **Storage areas:**

Materials such as motor oil hydraulic oil and paints are stored either in the warehouse or in paint lockers/hazmat containers in the dry-dock or the land based areas.

- **Dry-dock maintenance:**

This involves the general up-keep of our dry-dock, with the majority of the maintenance being performed with-in the dry-dock wing walls of the dry-dock.

- **Operation of forklifts, manlifts and other equipment:**

Depending on the scope of repairs that are associated with a vessel in dry dock, the operation of equipment is essential and needed at times to accomplish the repairs. The above types of equipment are potential sources of pollutants.

Table 2. List of pollutants with a reasonable potential to be present in effluent in significant quantities

Zinc	Oil
Lead	Grease
Copper	Hydraulic Fluids
Arsenic	Diesel Fuel
Cadmium	Gasoline
Chromium	
Mercury	
Tin	
Solids	

Exhibit 3
Marisco, Ltd.
Main Facility
Days of Unpermitted Stormwater Discharge

Month and Year	No. of Days of Rain => 0.1 inch
Nov 2007	4
Dec 2007	7
Jan 2008	1
Feb 2008	3
Mar 2008	2
Apr 2008	2
May 2008	3
Jun 2008	1
Jul 2008	2
Aug 2008	2
Sep 2008	2
Oct 2008	2