



## PORT OF STOCKTON - STORM WATER UPDATE

### Periodicals

The Port of Stockton (Port) is the land owner of nearly all property in the Stockton Port District and owns and operates the infrastructure that conveys storm water runoff to the local waterways. As a landlord port, the Port leases property to tenants which also use the Port's stormwater infrastructure.

In accordance with federal and state requirements, the Port's storm water discharge is covered under a National Pollutant Discharge Elimination System (NPDES) permit. The NPDES permit identifies the Port as the responsible party for the portion of adverse water quality impacts in local waterways that are caused or contributed to by the port district's storm water discharge. The NPDES permit also requires the Port to implement a Storm Water Management Program to address sources of pollutants from construction sites, industrial/commercial sites, new development, and illicit discharges on Port and tenant facilities. In compliance with these requirements, but also as part of the Port's vision to be a proactive Environmental Steward, the Port created the *Storm Water Update* newsletter in July 2017.

The *Storm Water Update* is a monthly communication which provides friendly, frequent, and targeted newsletters on issues relating to pollution prevention and site storm water management to private industrial and commercial facilities whose operations are in the Stockton Port District. The newsletters provide information on one single topic each month and includes the rationale for addressing the highlighted topic; applicable federal, state, or local regulatory requirements; guidance on addressing issues; and contact information if tenants have questions or need additional information. These topics are relevant to seasonal activities or current events, such as preparing an industrial facility for the onset of the wet season (central California has distinct wet and dry seasons), or to address pollutant sources that have recently come to the Port's attention. The newsletters serve as readily available outreach material or supplemental information that the Port can provide to site operators during routine storm water inspections.

### **1. WHAT ARE/WERE THE ENTRY'S SPECIFIC COMMUNICATIONS CHALLENGES OR OPPORTUNITIES?**

The *Storm Water Update* has allowed the Port to both work towards its vision to be proactive in minimizing impacts on local water quality and to promote compliance with regulatory requirements. The newsletter helps to address the following communication challenges associated with private industrial and commercial facilities as sources of pollutants to the Port's storm water runoff.

# STORM WATER UPDATE

## A QUICK GUIDE TO DEALING WITH SPILLS

Non-liquids are a growing concern at the Port of Stockton. The Port is mandated by its Phase I NPDES Permit to clean up spills at its Tenant's site. With HAZWOPER trained First Responders, we want to ensure that all spills at the Port are reported and cleaned up immediately. This newsletter is to help you comply with applicable regulations and answer frequently asked questions. Questions such as: Who is responsible for cleaning up a spill/release? Under what circumstances? Or who do I report to if a spill/release occurs?

**Under 40 CFR 110.3, reportable oil or oil based product spills are those that:**  
1. Cause a visible sheen, emulsion, or discoloration of the surface of the water or adjoining shorelines or causes a sludge or debris to collect on or beneath the surface of the water or upon adjoining shorelines.  
2. Cause a visible film or coating on the surface of the water or adjoining shorelines.  
3. Cause a visible residue on the surface of the water or adjoining shorelines.  
4. Cause a visible residue on the surface of the water or adjoining shorelines.  
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9. Cause a visible residue on the surface of the water or adjoining shorelines.  
10. Cause a visible residue on the surface of the water or adjoining shorelines.



When used in the location and use of absorbents and spill notification requirements. Transporters are required to have spill equipment on their vehicles and are to respond to spills during filling operations. All drivers must notify the Facility Response Coordinator of any spills. NOTE: REPORT ALL SPILLS IMMEDIATELY. Place spill response signs in plain view at all fueling islands and transfer locations.



Spills should be cleaned up immediately by trained personnel using absorbent materials. Used materials are to be placed in empty 55-gallon drums with secure covers and disposed of off-site. Spills that require a qualified disposal contractor to remove the contaminated soils and spilled materials are to be cleaned up by trained personnel using absorbent or spill containment materials.

Personnel should first...



The State Water Board passed a new regulation on trash pollution prevention on April 7, 2018, adopted as an amendment to the Water Quality Control Plan for Ocean Waters of California. This regulation, known as the **Trash** in all natural waterways. Applying to all Phase I and II permittees under the NPDES Municipal Sewer Systems (MS4), these new regulations have been coined, "The Trash Amendments", provide statewide consistency for the Water Boards' regulatory approach to protect aquatic life and reduce environmental issues associated with trash in state waters, while focusing limited generating areas.

The objective is to ensure that the MS4 has the certified protective material to keep trash as it enters the storm drain system or natural waterways. In order to comply with these requirements, the amendments will be implemented statewide in stages over the next couple of years.

The Port of Stockton will need support from you, the tenant, in order to successfully comply with all of the new standards regarding trash pickup and prevention. Listed below are 2 action steps that will benefit the Port greatly in meeting these new goals:

1. Implementing preventative measures is a key step toward keeping trash out of the waterways. If there is trash on a tenant's site, even if the tenant did not generate the trash, they are still responsible for it. Ensure that BMP's are in place to prevent windblown trash from entering any storm drain or the perimeter of your site.
2. The most important step in cutting down on trash pollution is cleaning it up. Routinely having your site evaluated for trash and then properly picking it up and disposing of it helps maintain and keep your site clean. But, if done habitually, it in effect fulfills the requirements of California's new "Trash Amendments" regulation.

Helpful Tools: Storm Drain Bags & Windscreen help prevent trash from leaving your site and polluting other areas.

### Challenge 1: Promote Awareness

Site operators and managers of industrial commercial facilities often lack awareness about regulatory requirements, pollution prevention activities, and available resources. The Storm Water Update overcomes this lack of awareness by providing frequent reminders of pollution prevention activities that should occur throughout the year. It also gives information on regulatory requirements and resources that may be applicable to private facilities. Finally, it supplies the tenants with directions on how to obtain further information on topics covered in the newsletters, as well as a direct contact to solicit feedback.

### Challenge 2: Enhance Environmental Compliance

Environmental compliance activities can be perceived as burdensome among the industrial/commercial community, so it is necessary to maintain a positive, proactive attitude when communicating pollution prevention requirements.

Port environmental staff regularly inspect private facilities at the Port for compliance with applicable storm water management requirements. Although inspections are intended to be positive and helpful, site deficiencies must be addressed, even if it requires the Port to escalate enforcement actions. Some industrial and commercial facilities may view compliance requirements as unimportant or burdensome, but there can be significant ramifications for non-compliance. As such, the Port believes that addressing site deficiencies to prevent pollution of storm water runoff is a benefit to all parties involved.

The Port's newsletter communicates in a positive manner that environmental benefits are best achieved by taking proactive steps to maintain compliance, as opposed to simply responding to enforcement actions.

### 2. HOW DOES THE COMMUNICATION USED IN THIS ENTRY COMPLEMENT THE ORGANIZATION'S OVERALL MISSION?

The Port takes environmental stewardship very seriously. The Sacramento-San Joaquin Delta, in which the Port operates, is an important and delicate environment. Not only does the Delta provide drinking water for two-thirds of the state, it acts as a habitat for countless fish, birds, and other wildlife.

The Port is deeply committed to maintaining and protecting this area, and the Port's environmental programs aim to enhance air quality, water quality and wildlife habitats in the Delta and surrounding communities. Industrial and maritime activities at the Port of Stockton have the potential to produce many types of pollutants. The Port of Stockton is proactive in its approach to building positive relationships with private industrial and commercial site operators to ensure that pollution prevention activities are implemented so that storm water runoff discharged from the Port of Stockton and other industrial and maritime activities do not adversely influence the integrity of local waterways.

The *Storm Water Update* newsletter exemplifies the Port's proactive approach and works to maintain positive relationships with site operators and managers that can be leveraged for environmental protection.

your first line of defense in achieving water quality. Sweeping, loose and covering / closing trash bins ensures that these materials don't migrate

Storm Water Sampling

May 31st

**Helpful Tools:**

1. Storm Drain Bags
2. Grate Gator
3. Filtrex Wattle + Rock

Strategically placed rock or gravel bags are also helpful in filtering out surface material.

you, the tenant, are not sampling, whatever material is allowed in the storm drain is removed to allow



into the catch basins of your storm drains that need to be treated, or removed at steps you can implement to clean and seal off your DI's.

Helpful Tools: Catch Basin Spoon, Shop Vac, Visqueen Plastic

- One of the best ways for increasing the quality of your storm water sampling is to clean out your catch basins. This is as simple as removing the sediment with a long scoop shovel, posthole digger, and/or shop vac.

Consistently cleaning your catch basins each year results in less and less material that will disrupt your sampling during the rainy season. Spending a few minutes performing maintenance tasks now will be time well spent & may produce a more successful sampling event.
- The easiest way of ensuring no material will continue to fall into the DI is by sealing it with plastic. Regular garbage bags are often too thin to last the summer, a thicker material like visqueen is perfect for the job. Before placing the drain lid back onto the drain, place a piece of visqueen over the entrance and then carefully place the lid back on it's designated area. Not only does this help keep sediment out, if a hazardous spill occurs, it ensures the drain is completely protected.

Before After

Note A: Make sure the edges of the visqueen stick out enough from the drain so that you can step on it while removing the drain

### 3. WHAT WERE THE COMMUNICATIONS PLANNING AND PROGRAMMING COMPONENTS USED FOR THIS ENTRY?

The goal of the *Storm Water Update* newsletter is to raise the awareness of industrial and commercial site operators at the Port so that operators take actions to help protect the environment. The primary audience for the newsletters are site operators and targeted staff involved with environmental compliance and pollution prevention. Because the newsletter demonstrates the Port's implementation of their Storm Water Management Program, state and federal regulatory staff that oversee Port compliance with the NPDES permit are a secondary audience.

**Objective 1: Provide industrial site operators frequent reminders to help maintain their understanding that addressing pollution prevention related to stormwater management is an ongoing activity.**

#### Measurable Milestones:

- Circulate newsletter each month  
*Metric: Standardize document distribution frequency*
- Generate and maintain targeted distribution list of staff at industrial and commercial facilities  
*Metric: Ensure document distribution list is actively managed and maintained*

**Objective 2: Communicate on a variety of topics that are relevant to site operators regarding storm water pollution prevention, including regulatory updates, best management practices and evaluation results.**

#### Measurable Milestones

- Document pollution prevention deficiencies during storm water evaluations of industrial and commercial facilities at the Port of Stockton  
*Metric: Perform routine inspections and document deficiencies on inspection forms*
- Use Port environmental staff and environmental consultants to identify list of newsletter topics based on current regulations, site deficiencies noted in inspections, or other relevant topics  
*Metric: Document that newsletter topic list is being maintained and that Port staff and consultants provide routine feedback on topic selection*

### 4. WHAT ACTIONS WERE TAKEN AND WHAT COMMUNICATION OUTPUTS WERE EMPLOYED IN THIS ENTRY?

The Port has developed and implemented the following strategies to achieve Objectives 1 and 2:

- Strategy:** Create a newsletter that is simple and organized in an aesthetically pleasing and logical manner.
- Strategy selection:** This strategy helps engage readers who could lose interest if the newsletter was too lengthy, bland-looking, or not organized in an easy to read, straight-forward manner.
- Actions to carry out strategy:** The newsletter is limited to one page; is designed with flow charts/bubbles to guide the reader through the material; demonstrates examples with pictures, photos, or diagrams; and approaches each topic in a concise and efficient but friendly manner.



# STORM WATER UPDATE

## HOW TO MAINTAIN SECONDARY CONTAINMENT

Secondary containment is a mandatory precaution for all facilities that seeks to "prevent discharges of oil into navigable waters of the United States and adjoining shorelines." While this is the main reason for the state requiring secondary containment, it is also important, as that secondary containment is your first line of defense against large spills. If a spill isn't properly contained during a spill, it can cause extraneous damage to your site and to the environment. It means it may cost a significant amount of money to properly cleanup, contain, and dispose of spilled oil. It is far cheaper and safer to maintain the required secondary containment than it is cleaning up and disposing of oil or soil that has been contaminated.

Secondary containment surrounding any area or item that has the potential for leaking oil-filled operating and manufacturing equipment, oil storage tanks, transfer areas, mobile refuelers, bulk storage containers, tank trucks, and other equipment are ways to maintain your secondary containment.



**NOTE:** The blue line in the pictured secondary containment is to illustrate that in the case of a spill, the material being contained should not exceed the line. The closer any potentially spilled material is to the brim of the containment, the closer the chances are to it spilling over.

Fully stocked Spill Kit + Absorbent material.

In pictures 1 and 2, we see incorrect examples on how secondary containment is being used. The material in the barrels and buckets can easily be spilled on the ground. Whereas in picture 3, we see proper containment. The area is dry, covered, properly contained, and a spill kit is standing by.



The National Oceanic and Atmospheric Administration (NOAA), is a helpful website that tracks temperature, hourly rainfall percentages, wind, and more.

Straw wattle can be used in a multitude of ways; it is a great idea to have a pallet of this on hand for any given situation. For storm water prevention, wattle can disseminate the path of water from creating a stream or current. The straw allows water to pass through it without blocking it, and disperses the water enough so that it doesn't pool. If you have a problem with loose surface material getting into a storm drain or site by the rain, the wattle can contain and also prevent any debris from going on the street, driveways, or down the storm drain.

### Drain screens, drain lids, and drain outlets

Regularly stay on top of housekeeping and clean up during the rainy season. Material from the surrounding area could be washed into your drain screens or outlets quickly lead to flooding. If you know that your site is prone to excess of loose surface material, make sure to clean your site before it rains. Sweeping hard surfaces, raking up leaves, and picking up trash can go a long way in preventing flooding, as well as keeping your site's processes moving smoothly. Remember to continually check up on these, and clean them out and debris. Remember to continually check up on these, and clean them out as soon as possible so that water flow can continue away from your site without bringing unnecessary material along with it.

### Straw Wattle, Rain Boots, Leaf Rake



It is an important initiative to monitor your site and look out for these issues. Even still, keeping up on the weather days in advance as well as during rain days will pay off in more than just having a tidy site. Clogged drains lead to flooding and surface material causes track out and hinders business operations. These basic instructions are key steps in making sure your site is able to operate smoothly under such conditions.

**Strategy:** Convey information that will help achieve the Port's goals and that is relevant to the primary audience.

**Strategy selection:** Making sure that the newsletter is carefully targeted and relevant facilitates its value to tenants. If the audience believes the newsletter to contain irrelevant information, the goal of raising awareness may not be achieved.

**Actions to carry out strategy:** The newsletter topics are selected by Port staff and contractors directly involved with implementing the Port's Storm Water Management Program, who have day-to-day interactions with operators and managers of private industrial/commercial facilities at the Port, and who are familiar with best management practices and resources available to implement the strategies communicated in the newsletters.

**Strategy:** Maintain elevated awareness of the need for ongoing pollution prevention activities by distributing the newsletter frequently.

**Strategy selection:** Providing frequent communications helps to keep site operators/managers aware that pollution prevention activities need to continue throughout the year.

**Actions to carry out strategy:** The newsletter is distributed monthly.

**Strategy:** Use email as the primary method of newsletter distribution.

**Strategy selection:** Using email facilitates quick and direct distribution of the newsletter to the target audience. Opening rates can also be tracked measuring success.

**Actions to carry out strategy:** The newsletter is emailed to the target audience by Port staff.

## COMMUNICATION OUTPUT AND IMPLEMENTATION

Each newsletter is produced and distributed through implementation of the following steps:

**Ongoing:** The Port environmental department works with consultants to maintain a list of newsletter topics.


### One month prior to newsletter distribution:

- Identify specific topic for next newsletter
- Prepare newsletter content and mock-up newsletter
- Preparation of final newsletter
- Final review of newsletter

**The month of newsletter distribution:** The final PDF version of the newsletter is distributed to the target audience via email.

## 5. WHAT WERE THE COMMUNICATIONS OUTCOMES FROM THIS ENTRY AND WHAT EVALUATION METHODS WERE USED TO ASSESS THEM?

The Storm Water Update is already showing signs of success. Tenant awareness about pollution prevention activities and regulatory requirements on storm water issues is increasing. Most importantly, water quality is improving in the Delta. To date, 12 Storm Water Updates have been developed and distributed on a broad variety of topics ranging from waste disposal plans to how to identify the appropriate Standard Industrial



Classification number. The Port has included information on cost-saving measures and expanding compliance to vendors as well as tenants. Reception has been positive, with tenants contacting Port staff to inquire about implementing additional best management practices and ensuring compliance with Port directives. Before the newsletter, the Port was the primary initiator of conversation. Now, communication is collaborative and storm water management is a joint effort. The Port hopes to begin highlighting tenant success stories to increase collaboration among tenants as well.

Storm Water management is an ongoing effort at the Port. The newsletter is just one important piece of a comprehensive program and communication must be multi-faceted to ensure long-term and sustained success. For example, in addition to the update, the Port conducts an annual Storm Water Managers Workshop for Port tenants and employees, who are responsible for storm water protection at their sites. This workshop highlights new and existing storm water regulations and offers advice on how to maintain compliance. The success of programs such as these are having a measurable effect on the Port's environment. Despite expanding operations in 2017, storm water compliance issues have dropped. The Port looks forward to furthering the newsletter to other environmental topics in the future.