

The background of the slide is a blurred photograph of a harbor scene. In the foreground, several people are walking on a pier or dock. In the middle ground, there are numerous boats, including sailboats and motorboats, moored in the water. In the background, a city skyline is visible under a clear blue sky. The text 'Port of Seattle' is overlaid on the image, with the word 'Port' on the top line and 'of Seattle' on the bottom line. To the right of the word 'Port' is a logo consisting of three horizontal, slightly curved bars in light blue, green, and dark blue.

# Port of Seattle

Stormwater in Western  
Washington



# An Overview of Today's Topic

- How It All Fits Together
- Useful Tools
  - SWPPPS
  - GIS
  - Education and Outreach
    - Web site
    - ECAP
- Emerging Issues for the Port of Seattle



# Permits & City Code Overlap On Port Properties and Tenants



**Port Phase I Municipal Permit**

**City Stormwater  
Code**

**Ecology Permits  
(e.g. Industrial)**

**Port or  
Port Tenant**



# SWPPPs - the Guiding Light

- “SWPPP(s) shall be prepared and implemented for all Port-owned lands, ..”

Port's GIS System



SWPPP = Stormwater Pollution Prevention Plan





# SWPPPs and SWPPP Templates

## Six Types of SWPPPs

1. Boatyard General Permit
2. Construction General Permit
3. Industrial General Permit
4. Individual Permit (aka. Shipyard)
5. Port Municipal
6. Tenant Municipal



# Implementation of SWPPPs

- SWPPP equals **“Implement BMPs”**
  - Routine Catch Basin Cleaning / Sweeping
- We clean 731 catch basins per year on Port-owned property.
- We sweep 2,878 acres per year on Port owned property.
- We remove at least 300 tons of waste per year from these activities.



# Mapping the System

- Delineates roles and responsibilities between you and Port tenants.
- Facilitates the implementation of BMPs
  - Where are my catch basins that I need to clean?
- Helps with spill response
  - If I spill it here, where will it go?
- Is required by POS's Municipal Permit



# Tenant Responsibility

- Port leases define who is supposed to do what

Port collaborates and helps tenants

- Provide SWPPP Templates
  - Consultant Support to Write SWPPPs
  - Web site with Technical Information
  - AND .....





# 2010

## AAPA ENVIRONMENTAL AWARDS

# Port of Seattle

Environmental  
Compliance Assessment  
Program  
Comprehensive Environmental  
Management



# ECAP Introduction

- ECAP is a tenant and industrial property environmental compliance evaluation and assessment program
- Administered at the Port of Seattle
- Program model could be implemented by municipalities, property management firms or government agencies with significant real assets

# Program Overview (continued)

*The goal of ECAP is to minimize environmental impacts by industrial tenants and maintain regulatory compliance through education and thorough assessments*



# Program Overview (continued)

## Benefits of implementation

### Property Owner

- Assure environmental compliance
- Reduce environmental/regulatory liability
- Verify facility activities
- Face time with tenants
- Promote pollution prevention
- Promote environmental stewardship
- Identify areas of concern
- Positive public relations

### Tenant

- Receive free consultation by seasoned environmental professionals
- Realize potential cost savings through waste minimization and recycling recommendations
- Prevent costly fines or cleanup
- Positive public relations



# Implementation

## Team Formation

- Assemble experienced team with diverse experience and training
- Tenant activities vary (i.e. marine industries, construction, warehousing, light manufacturing, parking)
- ECAP must be flexible and able to accommodate all levels of corporate sophistication



# Implementation (cont.)

## Forms

- assessment forms
- correspondence forms



# Getting Started

- Coordinate activities with lease holders (property managers)
- Get access to tenant information (lease, operating agreements, site history etc.)
- Identify appropriate tenant contacts

# ECAP Process

ECAP site visits are a three part process:

- 1) Pre site visit research (compile maps, conduct EPA ECHO search, etc.)
- 2) On site interview
- 3) Site walk (avoid the term *inspection*)
- 4) Post Assessment Activities

[ECAP Process.pdf](#)



# Performance Metrics

- Housekeeping, aesthetics (visual improvements)
- Waste minimization (i.e. downgraded generator status)
- Stormwater discharges (DMRs and BMPs)
- Compliance deficiency addressed (i.e. required plan has been developed or BMPs implemented)



# Steps for Positive Collaboration

- Avoid development of negative business relationships (the tenants pay the bills!)
- Avoid being perceived as an enforcement agency
- Avoid offering interpretation of complex regulatory issues (refer tenant to appropriate agency)
- Keep in mind the profit margins, staffing and sophistication of smaller operations

# Steps (cont.)

## Major noncompliance or criminal activities

- Should be directed to appropriate authorities/agencies
- Seek legal counsel
- Be aware of your legal obligations and rights

# Common Findings

- Lack of Spill Prevention, Control and Countermeasures Plan (SPCC Plan) per 40 CFR 112
- Facilities assuming RCRA Conditionally Exempt Small Quantity Generator Status (CESQG) when they should not
- Labeling, holding times for waste
- No secondary containment for liquid storage
- Lack of Stormwater BMPs





# Summary - Tools in the Toolbox

- GIS
  - Map of all conveyance/outfalls
  - Map of Permit coverage
- Focus on SWPPPs = Implement BMPs
  - Templates and support
- ECAP = Working with Our Tenants



# Other / Emerging Stormwater Issues

- Source Control to Prevent Recontamination of Sediments
- Low Impact Design (infiltration of rain water) – a good idea but potentially problematic
  - Tidal influence / high groundwater
  - Facility weight requirements
  - Contaminated soils
- Retrofit

