Port ______ Pof Seattle

Stormwater in Western Washington

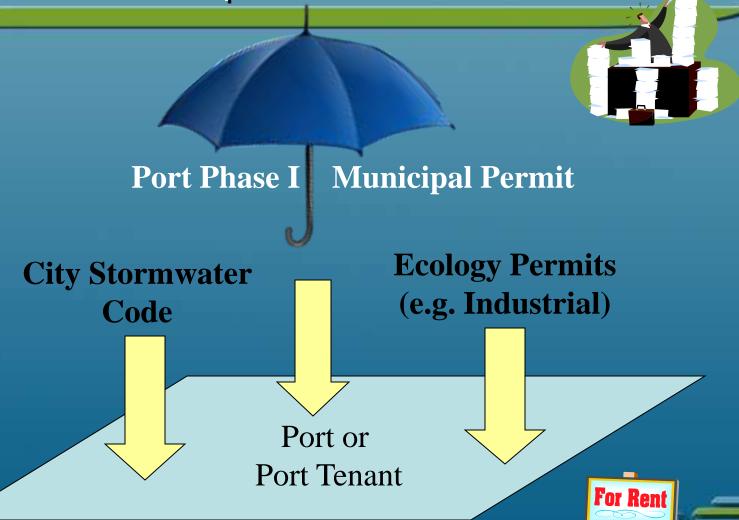


An Overview of Today's Topic

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







SWPPPs - the Guiding Light

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

> Port's GIS System



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 basing 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





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 by 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





