DEPARTMENT OF ECOLOGY
State of Washington

Modification of Permit Coverage Form for Industrial Stormwater General Permit

Permit No. WAR-000191

I. Operator/Permittee for the Facility (All permit and billing correspondence will be mailed here)

Operator/Permittee's Name	Phone No.	Email Address
Port of Port Angeles (Attn: Jesse Waknitz)	360-417-3452	jessew@portofpa.com
Company Name: Port of Port Angeles		
Street Address or P.O. Box: 338 W. First Street		
City: Port Angeles	State: WA	Zip + 4: 98362-0251

II. Modified Permit Information CHECK ALL THAT APPLY

☐ New Industrial Process (requires public notice), please list the associated SIC codes:

1					2					3					4					5				

Type or Nature of New Industrial Activities: _____

Are there new monitoring points associated with the new industrial process? ☐ No ☐ Yes

If no, please list the previously established monitoring points associated with the new process (i.e, CB1, DP4):

_____

If yes, please identify new monitoring points: _____

Discharge identifier. These cannot be symbols. (maximum of three characters ex. 01A)	Latitude degrees, minutes, seconds	Longitude degrees, minutes, seconds	Location description (i.e. Catch Basin 1)
	° ' N	° ' W	
	° ' N	° ' W	
	° ' N	° ' W	

If Applicable, New Receiving Water

Receiving Water Body	Latitude degrees, minutes, seconds	Longitude degrees, minutes, seconds
	° ' N	° ' W
	° ' N	° ' W

What type of modification are you requesting?

☑ Level 2 / Level 3 Deadline Extension, please list the new deadline requested (MM/DD/YYYY): December 31, 2019

- Attach detailed technical basis for extension. Include proposed timeline for completion and describe issues that affect completion date; for example, state/local permits, study, design, financing, professional services and contracting, etc.

☑ Level 2 / Level 3 Waiver. Attach technical basis for request.

- If request is based on claim that it is "not feasible" to perform corrective actions, provide detailed information to support request (e.g., lease, contract, affidavit, maps, photos, and/or other documentation).
- If request is based on claim that corrective action is "not necessary" to prevent violations of water quality standards, Ecology recommends including an engineering report and sampling information to support claim.

☐ Other (please explain): _____

DEPARTMENT OF ECOLOGY

FEB 13 2015

WATER QUALITY PROGRAM

III. Public Notice

Facilities modifying existing coverage must publish a public notice at least once a week for **two** consecutive weeks with **seven** days in between publications, in a **single** newspaper of general circulation in the county in which the facility is located. Ecology cannot grant permit coverage sooner than the end of the 30-day public comment period, which begins on the date of the second public notice.
Submit (or fax: 360-407-6426) the application to Ecology on or **before** the date of the first public notice. If you fax the application to Ecology, you must follow up with hard copy by mail.

Date of the first public notice: 2 / 18 / 2015
Date of second public notice: 2 / 25 / 2015 (Begins 30-day public comment period)
Example: Date of the first public notice: 01 / 01 / 2010
Date of second public notice: 01 / 08 / 2010

Name of the newspaper that will publish the public notices: Peninsula Daily News

Complete this template using site-specific information. The **bold** language is required by WAC 173-226-130 and must be included in its entirety. (Either use the fill-in template below or attach on a separate sheet of paper, if necessary.)
Type in name of applicant,Type in address of applicant **is seeking modification of coverage under the Washington Department of Ecology's NPDES General Permit for Stormwater Discharges Associated with Industrial Activities at the industrial site, known as** Type in site name **located at** Type in street address **in** Type in name of nearest city.

Activities requiring permit modification include Briefly describe the modification, i.e., adding the industrial process, requesting a waiver of level 2 or 3 corrective action.

Any person desiring to present their views to the Department of Ecology concerning this application may notify Ecology in writing within 30 days from the last date of publication of this notice. Comments may be submitted to:

Washington Dept of Ecology
Water Quality Program – Industrial Stormwater
PO Box 47696
Olympia, WA 98504-7696

IV. Certification of Permittee

"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."

Chris Hartman/Dir of Engineering	Port of Port Angeles	2/11/2015
Printed Name	Company	Date
Signature		Date 2/11/15

***Federal regulations require this application is signed by one of the following:**

A. In the case of corporations, by a principal executive officer of at least the level of vice president.
B. In the case of a partnership, by a general partner of a partnership.
C. In the case of sole proprietorship, by the proprietor.
D. In the case of a municipality, state, federal, or other public facility: by either a principal executive officer or ranking elected official.

Public Notice

Port of Port Angeles, 338 W. First Street, Port Angeles, WA is seeking modification of coverage under the Washington Department of Ecology's NPDES General Permit for Stormwater Discharges Associated with Industrial Activities at the following three industrial sites, known as Port Angeles Marine Terminal 7 located at 1301 Marine Drive, Port of Port Angeles Marine Terminal Log Yard located at 615 Marine Drive and Port Angeles Marine Terminal located at 202 North Cedar Street, all located in Port Angeles.

Activities requiring permit modifications include requesting waivers from Level 2 corrective actions so that Level 3 corrective actions may be completed instead and an extension of deadlines for above detailed Level 3 corrective actions.

Any person desiring to present their views to the Department of Ecology concerning this application may notify Ecology in writing within 30 days from the last date of publication of this notice. Comments may be submitted to:
Washington Dept of Ecology
Water Quality Program – Industrial Stormwater
PO Box 47696
Olympia, WA 98504-7696

Publish: February 18, 2015 & February 25, 2015

PORT OF PORT ANGELES
WASHINGTON

11 February 2015

Washington Department of Ecology
Attn: Joyce Smith
Water Quality Program – Industrial Stormwater
PO Box 47696
Olympia, WA 98504-7696

Re: Permit Modification Request for Industrial Stormwater General Permit Nos. WAR000314, WAR000191 & WAR000337, Port of Port Angeles, WA & Additional Information to Support These Requests.

Dear Ms. Smith:

Attached are Modification of Industrial Stormwater General Permit (ISGP) Coverage Forms requesting waivers from Level 2 (L2) corrective actions and extension of deadlines for Level 3 (L3) Corrective Actions triggered by benchmark exceedances at the Port of Port Angeles (Port) during calendar year 2014. This document provides detailed technical information supporting the Port's requests for waivers from L2 corrective actions and extension of deadlines for L3 corrective actions at the Port until December 31, 2019.

For clarification, the Port intends to implement stormwater runoff treatment for discharges from all of the ISGP-covered facilities listed below. The Port has requested waivers from L2 corrective actions that would be "not necessary to prevent discharges that may cause or contribute to a violation of a water quality standard" in accordance with ISGP condition S8.C.4.b, when runoff treatment is implemented.

Background of Industrial Stormwater General Permit Coverage at the Port of Port Angeles

Stormwater discharges from the Port facilities listed below are covered under Ecology's ISGP. Facility descriptions and a discussion of operations conducted at each facility are included in the sections that follow.

Facility Identifier	ISGP No.	L2 & L3 Corrective Actions Triggered in 2014
Terminal 5 Log Yard (T5)	WAR004570	None
Terminal 7 Logyard (T7)	WAR000314	L2 - chemical oxygen demand (COD), L3 - copper & turbidity
Marine Terminal Log Yard/ Cargo Surge Area (CSA)	WAR000191	L2 – copper, COD, & turbidity
Marine Terminal 3 (T3)	WAR000337	L2 – turbidity, L3 – copper

338 West First Street
P.O. Box 1350
Port Angeles, WA 98362

(360) 457-8527
Fax: (360) 452-3959
www.portofpa.com

Facility Descriptions and Operations

The T5 & T7 Log Yards (collectively referred to as the Log Yard), CSA, and T3 are located in Port Angeles, Washington, immediately adjacent to Port Angeles Harbor, as shown on Figure 1. Site activities generally include loading, unloading, and storing logs. More details regarding each facility's characteristics and operations are provided in the following sections.

Terminal 5 and Terminal 7 (Log Yard)

The Log Yard is located on the northern side of Marine Drive and consists of the T5 and T7 facilities, which operate as one log handling and storage yard and are, thus, considered one site for the purposes of this document. The Log Yard conducts log sorting, banding, storage, rafting, and round booming for the Olympic Peninsula timber industry. The specific characteristics of each terminal are described below.

T5 is an approximately 12.4-acre facility located on the 1500 block of Marine Drive. It is bounded on the north and northeast by Port Angeles Harbor, on the northwest by property owned by Nippon Paper Industries USA, on the southwest by Marine Drive, on the southeast by T7, and on the south by the former Washington State Department of Transportation (WSDOT) Graving Dock Site (former WSDOT site), which is now owned by the Lower Elwah Klallam Tribe (Tribe). The T5 facility is largely unpaved, except for a small area to the northeast and adjacent to Port Angeles Harbor. An individual drainage system onsite collects runoff via a network of catch basins and storm drains, conveying stormwater runoff to three outfalls discharging to Port Angeles Harbor under ISGP No. WAR004570.

T7 is an approximately 21.4-acre facility located at 1301 Marine Drive. It is bounded on the northeast by Port Angeles Harbor, on the north by T5 and the former WSDOT site, on the south by Marine Drive, and on the southeast by the Port Angeles Boat Haven. The northeastern portion of T7 is paved, and the southwestern portion is unpaved. An individual drainage system onsite collects runoff via a network of catch basins and storm drains, conveying stormwater to four outfalls that discharge directly to Port Angeles Harbor under ISGP No. WAR000314.

Cargo Surge Area

The CSA is an approximately 5.7-acre facility located at 615 Marine Drive. The facility is bounded on the north by Port Angeles Harbor; on the west by a public parking lot; on the south by West Boat Haven Drive, Marine Drive, and Petit Oil; and on the east by Tumwater Creek. Most of the northern portion of the site is paved, except for the hauling road that runs along Port Angeles Harbor. The southern portion of the site, adjacent to Tumwater Creek, is unpaved. An individual drainage system onsite collects runoff via a network of catch basins and storm drains that convey stormwater runoff to four outfalls discharging to Port Angeles Harbor under ISGP No. WAR000191.

Terminal 3

T3, an approximately 3.6-acre, fully paved facility located at 202 North Cedar Street, consists of an overwater wharf and adjacent roadway. It is bounded on the north and west by Port Angeles Harbor, on the east by T1, and on the south by the marine facility owned by Westport and the area leased by Platypus Marine. Runoff from the wharf is collected via several deck drains that discharge directly into Port Angeles Harbor. Runoff from the adjacent roadway either flows overland into Port Angeles Harbor or is collected by a single catch basin, which also discharges into Port Angeles Harbor. Stormwater discharges from T3 are covered under ISGP No. WAR000337.

It should be noted that ISGP No. WAR000337 authorizes discharges from both Terminal 1 (T1) and T3, which perform different types of industrial operations. T3 regularly accommodates log-handling activities similar to those conducted at the Log Yard and CSA. T1 activities include ship repair, and stormwater discharges from this facility are managed appropriately by applying established applicable BMPs. Therefore, L3 corrective actions are proposed for T3 only.

Platypus and Westport

The Platypus and Westport sites also depicted on Figure 1 are located immediately adjacent to each other near the intersection of Marine Drive and North Cedar Street. Both sites are bound on the north by T3 and on the south by Marine Drive. To the east of Platypus Marine is the Pen Ply property and to the west of Westport is Tumwater Creek. Runoff from both sites is collected via catch basins and roof drains (commingling in various locations) and ultimately discharges directly to either Tumwater Creek or Port Angeles Harbor under each facility's own ISGP. Information regarding Platypus and Westport are included in this document as they are relevant to decision-making regarding stormwater conveyance and treatment that will impact the Port's timeline for implementation of L2 and L3 corrective actions.

CONSIDERATIONS IMPACTING CORRECTIVE ACTION TIMELINES

Implementing stormwater treatment at the Port represents a complex engineering and expensive construction effort that will have long term impacts on Port facility operations and economics. The work required to investigate, establish, and fund stormwater treatment for runoff from the vast portions of the Port where it is necessary is simply not feasible to accomplish by the ISGP-specified L3 corrective action deadline of 30 September 2015 for facilities triggering L3 corrective actions based on runoff sampling results collected in 2014.

The schedule for implementation of L3 corrective actions at the Port's ISGP-covered facilities is dependent on several factors including each site's physical characteristics, stormwater runoff quality, and micro and macro-economic considerations. The Port's drainage systems are complex, handling runoff from Port-owned and operated areas, Port-owned properties leased to other tenants, and privately-owned and operated properties within combined drainage systems that will need to be addressed.

Design of treatment systems necessarily must consider multiple potential pollutant sources where no one-size fits all, approved technology is available. Preliminary conceptual plans to collect, convey and treat runoff from these facilities were prepared in 2014. Due to the complexities of the drainage systems as mentioned above, outfall modifications and over water work appear to be necessary. This work would trigger US Army Corps of Engineers and Department of Fish and Wildlife project permits which can take many months to achieve. In addition, the nature of activities at the Port must consider current commodities as well as potential future site uses and changes in stormwater runoff characteristics. Thus, stormwater solutions must consider multiple potential pollutant sources and be designed to allow flexibility in future site uses. Consequently, additional time is required to properly evaluate treatment alternatives using bench-scale and in-field pilot testing means and methods

The Port is also a government agency, responsible to Clallam County tax payers. The Port's ability to fund these expensive projects is limited by the revenue generated from Port operations and the Port's bonding and repayment capacity which may vary over time due to economic forces beyond the Port's control. Projects requiring substantial capital investment also require Port Commission approval for all

phases of design and construction and the Port is legally bound to follow defined public processes for bidding and contracting with defined, often lengthy, timelines and processes that are non-negotiable.

CORRECTIVE ACTION TIMELINE

Please see the Corrective Action Timeline below which generally describes the major work tasks necessary to implement stormwater runoff treatment under what has been termed the Port of Port Angeles Waterfront Stormwater Improvement project. It should be noted that the project timeline was initiated proactively by the Port in early 2014, prior to triggering L2 and L3 corrective actions at the Port's permitted facilities.

The Port hired Kennedy/Jenks Consultants in March of 2014 to perform an engineering study identifying what level of stormwater treatment would meet State standards requiring implementation of All Known, Available, and Reasonable methods of prevention, control, and Treatment (AKART) at the Port's waterfront facilities. In general, Kennedy/Jenks Consultants' work included evaluation of existing site-specific record documents; field investigations of drainage conveyance elements, development of alternatives for conveying and treating stormwater at the four ISGP –permitted sites, and documentation of project constraints; and evaluation procedures used to frame the direction for developing the basis of design and final design for runoff treatment that may be implemented in the future. The final Preliminary Engineering Report prepared in early 2015 documenting Kennedy/Jenks evaluation includes a discussion of the stormwater conveyance and treatment alternatives evaluated and provides Kennedy/Jenks Consultants' recommendations for facility improvements based on each facility's physical and operational characteristics and considering a range of defined evaluation criteria.

The following table identifies the Port's proposed timeline for completion of design and construction of conveyance and treatment improvements to meet the Port's corrective action requirements:

Port of Port Angeles, Waterfront Stormwater Improvements Project, Corrective Action Timeline

Date	Event
03/2014 – 12/2014	Perform AKART evaluation (Preliminary Engineering Report)
01/2015 – 06/2015	Bench-scale and in-field pilot studies, line tracing investigations
06/2015 - 12/2015	30% Design (Logyard, CSA, T3)
01/2016 – 06/2017	Long-lead Project Permits
01/2016 – 12/2016	Logyard Final Design, Construction Permits, & Bid
01/2017 – 12/2017	CSA/T3 Final Design, Construction Permits, & Bid, Initiate Logyard Construction
01/2018 –12/2019	Finalize Construction (Logyard, CSA, T3), System Startup, O&M Manuals

Thank you for the opportunity to request additional time to complete design and construction of stormwater treatment for the Port's waterfront facilities and for your consideration of the Port's position undertaking such a landmark project and inherent complexities and costs. Please contact me at (360) 417-3422.

Regards,

Chris Hartman, P.E.
Director of Engineering
Port of Port Angeles