



SoundEarth Strategies, Inc.
2811 Fairview Avenue East, Suite 2000
Seattle, Washington 98102

May 14, 2020

Washington State Department of Ecology
Water Quality Program—Industrial Stormwater
P.O. Box 47696
Olympia, Washington 98504

SUBJECT: LEVEL THREE CORRECTIVE ACTION EXTENSION REQUEST
Alaska Boat Company
303 NE Northlake Way, Seattle, Washington
Permit No.: WAR-001246
Project Number: 1234-001-02

To Whom It May Concern:

SoundEarth Strategies, Inc. (SoundEarth), on behalf of Alaska Boat Company, is requesting an extension of the Engineering Report and implementation deadlines for the Level 3 Corrective Action Treatment BMP for the Alaska Boat Company facility, located at 303 NE Northlake Way, Seattle Washington (the Facility). During the 2019 calendar year, the Facility had three quarterly exceedances for copper triggering a Level 3 Corrective Action Treatment BMP. The Facility retained SoundEarth to provide Level 3 Corrective Action support in May 2020; however, due to COVID-19-related impacts, including delays to coordinate with third parties (e.g., the Seattle Department of Transportation), an Engineering Report submittal by May 15, 2020, is not feasible at this time, and we are requesting the Engineering Report submittal due date be extended to August 15, 2020. Due to the ongoing effects of COVID-19, the Engineering Report delay, and anticipated time frames to coordinate with third parties and procure required permits, we are also requesting the Level 3 Corrective Action implementation due date of September 30, 2020, be extended to March 15, 2021.

The project implementation timeline remains to be as soon as practicable, but due to the following items impacted by the COVID-19 pandemic discussed below, meeting the associated deadlines is not be feasible:

- The time required to conduct a feasibility study and evaluation of treatment options, including bench scale and pilot system studies.
- The preparation and submittal of an engineering report and approval process.
- The design of a construction bid plan set and bidding process.
- Permitting and coordination for in-water and near-water work and potential electrical work required for the treatment system through applicable city and county authorities.
- The construction of treatment system components and equipment availability.
- Contractor availability and scheduling upon receipt of the Engineering Report approval.

- Necessary coordination with neighboring properties and the Seattle Department of Transportation to develop controls for diverting run-on sheet flow stormwater currently affecting the Facility water quality.

The extension request has been submitted to maintain compliance with Section 8.D of the National Pollutant Discharge Elimination System Industrial Stormwater General Permit (the Permit). In accordance with Section 2 of the Permit, the Facility has completed the Modification of Permit Coverage Form (Attachment 1) and is in the process of submitting public notices (Attachment 2). The detailed information provided herein is intended to provide the technical basis for a time extension of a Level 3 Corrective Action Treatment BMP. If further information is needed to evaluate this extension request, SoundEarth and Alaska Boat Company are available to assist the Washington State Department of Ecology upon request.

If you have any questions, please contact SoundEarth at 206-306-1900 or the Alaska Boat Company directly.

Respectfully,

SoundEarth Strategies, Inc.



Erika Vossbeck
Project Scientist

Attachments: 1, Modification of Permit Coverage Form
2, Public Notice

cc: Christopher Kline, Alaska Boat Company
Roy Green, Alaska Boat Company

ATTACHMENT 1
MODIFICATION OF PERMIT COVERAGE FORM



Modification of Permit Coverage Form for Industrial Stormwater General Permit

Permit No. WAR001246

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

Operator/Permittee's Name Christopher Kline		Phone No.	Email Address chrisk@alaskaboatcompany.com
Company Name Alaska Boat Company			
Street Address or P.O. Box 303 NE Northlake Way			
City Seattle	State WA	Zip + 4 98105-6817	

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				
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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): 05/15/2021.
- 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): _____

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: 05 / 18 / 2020

Date of second public notice: 05 / 25 / 2020 (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: Seattle Daily Journal of Commerce.

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.)

Alaska Boat Company, 303 NE Northlake Way, Seattle, Washington 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 Alaska Boat Company located at 303 NE Northlake Way in Seattle.

Activities requiring permit modification include request of a time extension for implementation of a Level 3 Corrective Action following water quality benchmark exceedances occurring in the 2019 calendar year.

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."

Christopher Kline

Alaska Boat Company

5/15/2020

Printed Name

Company

Date

Signature

Date

*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.

Return this signed original document to the address below. Make sure you retain a copy for your records.

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

If you have any questions, please call:

- **Shawn Hopkins** 360-407-6442 or shop461@ecy.wa.gov for Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Skagit, Snohomish, Spokane, Stevens, Walla Walla, Whatcom, and Whitman counties.
- **Clay Keown** 360-407-6048 or ckeo461@ecy.wa.gov for Island, King (except Seattle), and San Juan counties.
- **Josh Klimek** 360-407-7451 or jokl461@ecy.wa.gov for city of Seattle and Kitsap, Pierce, and Thurston counties
- **Joyce Smith** 360-407-6858 or josm461@ecy.wa.gov for Benton, Chelan, Clallam, Clark, Cowlitz, Douglas, Grays Harbor, Jefferson, Kittitas, Klickitat, Lewis, Mason Okanogan, Pacific, Skamania, Wahkiakum, and Yakima counties.

To ask about the availability of this document in a version for the visually impaired call the Water Quality Program at 360-407-6600. Persons with hearing loss, call 711 for Washington Relay Service. Persons with a speech disability, call 877-833-6341.

ATTACHMENT 2
PUBLIC NOTICE



SoundEarth Strategies, Inc.
2811 Fairview Avenue East, Suite 2000
Seattle, Washington 98102

III. Public Notice

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