



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 11, 2021

Robert Hill, General Manager
NuStar Terminals Operations Partnership, LP
9280 W Stockton Blvd, Suite 230
Elk Grove CA 95758-8078

RE: Ecology Review of Submittal for State Waste Discharge Permit No. ST0006255, NuStar Terminals Operations Partnership, LP

Dear Robert Hill:

The Washington State Department of Ecology (Ecology) has reviewed the Storm Water Pollution Prevention Plan (SWPPP) submitted on November 8, 2020. Ecology has the following comment(s):

- 1) Section 1.1.2 and Section 1.1.3 were incorrectly numbered as 1.2.2 and 1.2.3 on top of the table on their respective page. Section 1.1.3 is also incorrectly cited as Section 1.2.3 under Section 3.1.
- 2) 1.1.3 Description of Outfalls and the Potential Receiving Waters, middle page, Stormwater Distribution System:
 - a) Bullet #4: *“Stormwater from the central pipeline area (Containment Area 7) generally puddles, evaporates and/or infiltrates. All stormwater accumulations are inspected for petroleum sheen.”*
 - i) If the stormwater is inspected monthly as described in other sections (Section 2.1, Section 7.1), the stormwater accumulations in the central pipe line area (Area 7) may not be inspected at all before being discharged. More timely or flexible inspections as necessary may be more appropriate for such operations
 - ii) Under what condition the stormwater should not be allowed to infiltrate if contamination is found? Should any bench marks being developed on handling the contaminated stormwater?
 - iii) Figure 3.2 of the stormwater system appears to indicate that stormwater from Area 7, and also from the buried stormwater conveyance piping are allowed to go to the Surge Pond directly for infiltration before being sent to Fire Pond for storage, the condition of such operation should be described in Section 1.1.3.
 - b) Bullet #5: *“Following inspection, stormwater from the external floating roofs is manually discharged onto the ground inside Containment Areas 1 and 2.”*
 - i) Since this is an actual discharge event, some sort of bench mark checklist should be developed to allow for discharge. Also, this discharge might happen whenever actual stormwater event occurs, the proposed Monthly Inspection might not work for this discharge, a timely or flexible inspection schedule corresponding to storm events might be more appropriate.

- c) A brief description of the pump(s) and how it works should be provided at the end of the first bullet.
- 3) Appendix A, A.1 Worksheets, Worksheet # 2, #2A, and #3 appear to be specific inspection records conducted in June 2020. Instead, Inspection Checklist(s) or guidance should be developed for the inspectors to refer during inspections, along with blank inspection worksheets that list the materials inventory and stormwater areas to be inspected.
- 4) Since storm events are more seasonal, and the secondary containments at the facility are designed based on NOAA 25-year, 24-hour storm event, a seasonally adjustable inspection schedule seems more appropriate than a monthly inspection schedule.

For questions concerning Ecology's comments, please contact your permit manager, Jacek Anuszewski, P.E. via Jacek.Anuszewski@ecy.wa.gov or 360-407-6288.

Sincerely,



Morgan Dörner
Industrial Permit Coordinator
Water Quality Program
Southwest Regional Office

MD (ST0006255)

CC: Chris Chan, NuStar Energy LP
Jacek Anuszewski, Ecology
Hans Qui, Ecology

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From: [Dorner, Morgan \(ECY\)](#)
To: ["Rob.Hill@nustarenergy.com"](mailto:Rob.Hill@nustarenergy.com)
Cc: [Anuszewski, Jacek \(ECY\)](#); [Qiu, Hans \(ECY\)](#); ["Chan, Chris"](#)
Subject: Ecology Comments on SWPPP Submittal for State Waste Discharge Permit No. ST0006255, NuStar Terminals Operations Partnership, LP
Date: Thursday, March 11, 2021 5:06:53 PM
Attachments: [ST0006255 NuStar Terminals Operations Partnership, LP - SWPPP Submittal Comments 3-11-21.pdf](#)

Robert Hill, General Manager:

Attached are Ecology's comments on the Storm Water Pollution Prevention Plan (SWPPP) permit submittal received 11/20/20. For questions regarding Ecology's comments, contact your permit manager Jacek Anuszewski.

Thank you,

Morgan Dorner
Industrial Permit Coordinator
Water Quality Program | Southwest Regional Office

