

From: [Graham, Sylvia L. \(ECY\)](#)
To: ["Cords, Alice"](#)
Subject: Status of violations
Date: Friday, February 17, 2023 11:38:35 AM

Hi Alice,

Following our discussion yesterday, here is an outline of where we stand with the violations described in the Ecology Warning Letter dated January 4, 2023.

The Permittee plans to maintain the existing geographic footprint of ISGP #WAR305536. Ecology has directed the Port of Bellingham to pursue one of the following options for the ABC Recycling lease area: 1) ABC Recycling obtain their own ISGP coverage for their lease area, or 2) Port of Bellingham apply for an individual permit that includes coverage of this industrial activity. The existing individual permit does not cover the type of industrial activity conducted by ABC Recycling. While the ABC Lease area is outside the footprint and coverage of ISGP WAR305536, the Port remains responsible for discharges from that area.

This list corresponds to the numbered violations in the Warning Letter.

- #1: Resolved
- #2: Resolved. Ecology determined the Permittee did not have to add a NAICS code under the current circumstances and the Port is already sampling the additional parameters that would be required under the added NAICS code. The Permittee has begun sampling all parameters at all sampling points.
- #3: Resolved.
- #4: Resolved.
- #5: Not resolved. The Port will not be extending the geographic footprint of ISGP WAR305536. Ecology awaits a decision on permit coverage for the ABC Recycling lease area, which will inform the choice of sampling points.
- #6: Not resolved. I have not received an update on improved BMPs in the ABC Recycling lease area, with the exception of improved barricades at the entrance. At the wharf, the Port stated ABC Recycling will begin using rubber curtains during loading/unloading activity. I want to see more improved source control BMPs for the wharf area. This should be part of the Level One Corrective Action for benchmark exceedances in the 4th quarter of 2022.
- #7: Not resolved – [Can you send records of the last vault maintenance?](#)
- #8: Resolved
- Note in box: Ecology determined the use of conveyor bulk leaders, grapple units, tilt pans, and harbor cranes, as currently used by the Permittee, are authorized by the ISGP.

Please let me know if you have any comments or questions. Let me know if you would like this uploaded to PARIS.

Thank you,

Sylvia

Sylvia Graham (she/her)

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My work hours: Tue-Fri 6:30am-5pm