



Modification of Permit Coverage Form for Industrial Stormwater General Permit

Permit No. W A R 3 0 5 5 3 6

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

Operator/Permittee's Name Rob Fix		Phone No. 360-676-2500 x 314	Email Address robfix@portofbellingham.com
Company Name Port of Bellingham		DEPARTMENT OF ECOLOGY	
Street Address or P.O. Box PO Box 1677		APR 18 2024	
City Bellingham	State WA	Zip + 4 98227-1677	WATER QUALITY PROGRAM

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): 9/30/2025.
 - 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: 04 / 17 / 2024

Date of second public notice: 04 / 24 / 2024 (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: Bellingham Herald.

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.)

Port of Bellingham, 1801 Roeder Ave, Bellingham, WA 98225 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 Bellingham Shipping Terminal located at 629 Cornwall Avenue in Bellingham.

Activities requiring permit modification include extending the completion deadline for a level 3 corrective action to September 30, 2025.

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."

Rob Fix

Port of Bellingham

Printed Name

Company

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.

MEMORANDUM

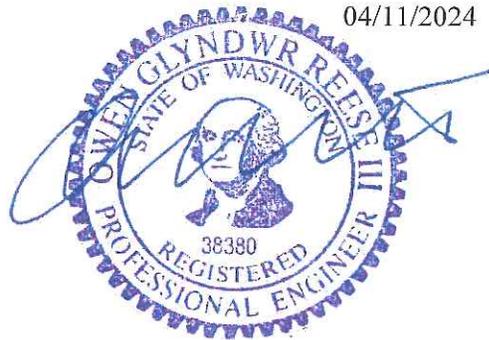
Permit No. WAR-305536
Aspect Project no. AS190345

April 11, 2024

To: Washington State Department of Ecology – Water Quality Program

cc: Alice Cords, Port of Bellingham

From: 04/11/2024



Owen G. Reese, P.E.
Principal Water Resources Engineer
owen.reese@aspectconsulting.com

Re: Detailed Technical Basis to Support Deadline Extension for Level 2/3 Corrective Action at the Port of Bellingham's Bellingham Shipping Terminal (WAR-305536)

This memorandum provides the detailed technical basis in support of a modification of permit coverage to extend the deadlines for completion of a Level 2 and Level 3 Corrective Actions under the Industrial Stormwater General Permit at the Bellingham Shipping Terminal (BST) facility, covered under permit number WAR-305536.

Stormwater monitoring results in 2023 triggered a Level 2 Corrective Action (Level 2) for lead and a Level 3 Corrective Action (Level 3) for turbidity, copper, zinc, and total suspended solids (TSS). As the Level 2 was triggered at the same outfalls involved in the Level 3, the Port intends to complete the Level 2 by installing stormwater treatment targeted at metals removal as part of the Level 3.

Prior to triggering the Level 3, the Port was already underway on design, permitting, and contracting of a major construction project to replace a significant portion of the pier at BST. To address stormwater management requirements for replaced impervious surfaces, the project includes stormwater treatment improvements appropriate for industrial facilities (StormwaterRx Aquip) in the drainage areas for outfalls B1D and B2A (Figure 1). At the beginning of 2024, contracting was completed and construction of the multi-year project is kicking off.

The Level 3 also includes outfalls (B1C, B3A-C, B4A, and W1A-C; Figure 1) that will not be affected by the construction project. The Port has contracted with Aspect Consulting to design stormwater treatment improvements for these outfalls and complete an Engineering Report for the whole project.

The Port is requesting an extension of the deadlines for completing the Level 2 and Level 3 to **September 30, 2025** based on the following factors: 1) a reasonable contingency added to the contractor's schedule for completion of the pier construction project and 2) the design, procurement, and installation process for the stormwater treatment improvements at the other outfalls.

Construction Schedule and Contingency

The most recent construction schedule provided to the Port of Bellingham identifies milestones for installation of the stormwater elements (conveyance and treatment) of July 12, 2024 and completion of the pier demolition, replacement and upland paving by May 14, 2025.

Major construction projects are often subject to delays and schedule changes resulting from challenges with labor, material, and equipment availability, weather conditions, subcontractor performance, conditions encountered during demolition, design changes, additional work, and coordination with ongoing use of the facility. These factors warrant adding several months of contingency to ensure that the project can be completed by deadline.

The Port proposes milestones of January 1, 2025 for installation of the stormwater elements and September 30, 2025 for completion of the pier replacement and upland paving.

Design, Procurement, Installation at Other Outfalls

The Port and Aspect have developed concepts for treatment improvements at the other outfalls and will complete the Engineering Report describing these improvements on time by the deadline of May 15, 2024; however, installation of these improvements will likely extend beyond September 30, 2024 given the complexity in completing the design, procurement, and installation at a public port, especially at a facility that is simultaneously undergoing a major construction project. The following concepts are being evaluated for the different outfalls based on the specific nature of the contributing area and potential sources:

- B1C (North portion of Wharf, not subject to loading activity): Wharf Treatment Units at edge of wharf, increased sweeping, and/or wattles.
- W1C and Substantially Identical (West portion of Warehouse 1 roof): coat galvanized vents on Warehouse 1 roof, media maintenance of existing roof downspout filters, and/or addition of oyster shells to existing roof downspout filters.
- B4A and Substantially Identical (Paved areas with Existing Media Filter Drains): pre-treatment improvements, media maintenance, and/or short-circuiting prevention measures.

Generally, these improvements are expected to be completed before the major construction is completed, though the coating project on the roof of Warehouse 1 may need to be phased over several years.

Proposed Schedule for Level 2/Level 3 Completion

The proposed schedule for completing the Level 2 and Level 3 is shown in Table 1 below:

Action	Duration	Schedule
Submit Engineering Report		15-May-24
Ecology Review	60 days	<i>14-Jul-24</i>
Review and resubmit (if necessary)	15 days	<i>29-Jul-24</i>
Ecology Review (if needed)	15 days	<i>13-Aug-24</i>
Construct Level 3 Corrective Action:		
W1C and Substantially Identical	~1.5 months	30-Sep-25
B1C	~3 months	15-Nov-24
B4A and Substantially Identical	~3 months	15-Nov-24
B1D and B2A:		
Construct stormwater system and electrical	40 days	<i>12-Jul-24</i>
Construction contingency	6 months	<i>12-Jan-25</i>
System on-line treating Basin 2 and Roof of Warehouse 2		12-Jan-25
Pier demolition, replacement and upland paving (Industrial activity returns to remainder of subbasin)	270 days	<i>14-May-25</i>
Construction contingency	~4.5 months	<i>30-Sep-25</i>
Annual Status Report (as component of ISGP annual report)		15-May-25
Level 3 Corrective Action Completed		30-Sep-25

Notes:

Bold indicates proposed deadlines

Italics indicate estimated, non-binding, milestones for key steps

Attachments: Figure 1 – Level 3 Extension Site Map

