

# Storm Water Pollution Prevention Plan

## 1. Property Description

The facility consists of four distinct areas equaling approximately 50,000 square ft.

### A. Main Pier

The main pier is where we conduct in water repairs. The pier is approximately 130' in length and can accommodate 5 to 6 vessels moored stern to the pier depending on width. This dock has impervious surface and is sloped away from the water so it drains into our marine railway and rain water catch basin.

### B. Marine Railway

We operate one marine railway capable of hauling vessels up to 130' in length and 600 gross tons. The vessels are hauled completely out of the water onto dry land and into a catch basin the entire length of the vessel. The railway area consists of concrete working yard surfaces; one on each side of the vessel. These yard surfaces drain into the railway catch basin.

### C. Shop Building

The shop building has a footprint of approximately 7200 square ft. and rests 15% on the wooden pier. The building houses the employee lunchroom, water treatment room, production offices and small fabrication shop.

### D. West Pier & Slip

The west pier and slip are constructed of wood. Used mainly for vessel moorage and vessel staging for haul out on the marine railway. The shop building extends onto this pier.

## 2. Spill Response

Spill response kits are located throughout the facility, see attached site plan. Kits consist of a combination of absorbent booms, absorbent pads, spreadable absorbent materials and waste bags. Spill response kits are to be re-stocked after use. Spill kits shall be inspected quarterly to ensure they are complete.

The General Manager assumes overall responsibility and control for spill response. Secondary/substitute authority is granted to the Shipyard Foreman & Superintendents. These individuals shall immediately report spills to the proper authorities in accordance with the MF NPDES permit.

Facility Foreman shall be responsible for mobilization and direct coordination of spill containment and response for spills in the upland areas.

Foreman shall be responsible for mobilization and direct coordination of response for spills that may result in pollutants reaching the waters of the state. This includes boom deployments and operation of small vessels utilized in coordination of said response.

## **2. Storm Water Pollution Control Measures**

Storm water pollution and prevention control measures are centered around prevention, or in the case of inadvertent spill, containment. Industrial activities and control measures are listed by location.

### **A. Main Pier**

The main Pier requires continuous monitoring during wind/rain events. Potential point sources for storm water pollution come from debris left on the pier, improper transportation of liquid wastes and materials and full or improperly monitored scrap and garbage hoppers. This pier is concrete and sloped into the railway catch basin. However, during extremely heavy rainfall storm water may drip over the edges into the water. Therefore, the following BMP's are in place to prevent pollutants from entering the water.

1. The main pier maintained in a clean and orderly manner.
2. Liquids shall be in enclosed containers and placed in secondary containment for transport. If materials are being loaded on a vessel, they shall remain in secondary containment until loaded.
3. Secondary containments shall be kept as dry as possible and not moved when containing liquids.
4. Removal of liquids from vessels shall only be accomplished by use of a vacuum truck operated by a subcontractor that is properly licensed and trained.
5. Trash and scraps shall be removed promptly. Liquid waste is not to be transported in open containers.

### **B. Marine Railway & Catch Basin**

The marine railway and catch basin is where we conduct 80% of our work and is our largest potential source point for storm water pollution should the treatment system become inoperative. Therefore, the following BMP's have been implemented.

1. Concrete work pads which abut railway catch basin shall be swept into catch basin after each sandblasting event to prevent waste transfer to other areas.
2. All trash or rubbish of any kind shall be picked up each day as to prevent the catch basin suction from being plugged and rendered inoperative.
3. The railway trolley and its cabling system, along with other components shall be thoroughly cleaned as to be free from all dust and grindings and welding debris prior to launching a vessel.

4. Tarpaulin and shrink wrap enclosures shall be deployed during any production work that could possibly produce dust or overspray that could enter the water.
5. Whenever feasible, painting will be accomplished by brush and roller to reduce the risk of overspray.
6. All sandblasting will be done with the injection of water to eliminate the risk of dust and paint chips entering the water.

### **C. Shop Building**

The shop building houses our water treatment system for the railway catch basin and yard, non-hazardous liquid storage area, employee lunch room, production office, and fabrication shop. There is little risk of storm water pollution in this area but the chance does exist so the following BMP's have been implemented.

1. The building floors shall be kept swept and clear of trash and garbage. The intent is to prevent the possibility of dust and particulates from being distributed thru the west end of the building onto the west pier.
2. All liquids in the liquid storage area shall be stored in the secondary containment.
3. The large shop doors shall be kept closed during strong wind events to keep any dust particles from being blown into the water.

### **D. West Pier**

The west pier is constructed of wood and decked with 4" by 12" planking. The primary risk of storm water pollution is that anything spilled or deposited on the pier may be washed thru the cracks between planks during a rain event. The following BMP's shall be implemented in this area to reduce that risk.

1. There shall be no liquids stored on the pier.
2. Any liquid transported across the pier shall be in secondary containment.
3. Vacuuming shall be utilized for cleaning to prevent particulates from being swept thru the cracks falling into the water.
4. Pier shall not be washed down. Pier may be wetted only as required by Seattle Fire Department to mitigate the risk of fire.

### **4. Employee Training**

Employees shall receive initial training during new hire orientation that includes MFSI BMP's. Continuing training shall include the incorporation of supplemental requirements periodically during weekly safety meetings.



#### **5. BMP's consistent with Special Section S9**

As we are still researching and developing our Sediment Sampling and Analysis Plan, best management practices with regards to sediment monitoring are still in process. SWPPP will be updated and re-submitted to reflect the changes inherent in the implementation of these novel sediment monitoring BMP's no later than the required first submittal date for the Sediment Sampling and Analysis Plan outlined in MFSI Permit No. WA0032174 under the approved summary of permit submittals (Table 1). **This deadline is July 1<sup>st</sup>, 2026.**

# Exhibit A & Exhibit B

