



Water Quality Program

Permit Submittal Electronic Certification

Permittee: Bellingham Shipping Terminal POB

Permit Number: WAR305536

Site Address: 629 Cornwall Ave
Bellingham, WA 98225

Submittal Name: 2024 Annual Report

Version: 1

Due Date: 5/15/2025

Covers Year: 2024

1. Benchmarks Exceeded

Did you exceed the benchmark for any parameter during the above noted calendar year (Jan 1st – Dec 31st)?

☒ Yes ☐ No

Additional comments:

There were 7 exceedances during Q1 for copper, lead, zinc and TSS at B1C, B1D and B2A. There were 3 exceedances during Q2 for turbidity, copper and zinc at B1D. There were 12 exceedances during Q3 for turbidity, copper, zinc and TSS at B1C, B1D, B2A, B3C and W1C. There were no exceedances during Q4. There were no exceedances of the pH or diesel-range total petroleum hydrocarbon (NWTPH-Dx) benchmarks in 2024 and no discharge from outfalls B3D, B3E and B3F. The site is implementing a Level 2/3 Corrective Action that was triggered in 2023.

2. Stormwater Problems Identified at the Facility

Problem Date	Problem Description
6/5/2024	Approximately one gallon of gear oil was spilled to the asphalt due to an equipment malfunction during cargo operations. The spill was promptly cleaned up using absorbent materials. The spill did not reach the storm sewer system. The incident was reported to Ecology, ERTS #731385.
11/25/2024	Port staff discovered an oily sheen on the pavement in Basin 3 during the monthly facility inspection. A facility tenant had just had a spill when fueling refrigeration equipment. The tenant staff had gone to retrieve spill supplies when Port staff discovered the sheen. It was estimated that less than 1 quart of diesel was spilled to the pavement due to overfilling a fuel tank. Tenant staff promptly cleaned the spill using oil absorbent materials. The sheen did not reach the waters of the state.

3. Corrective Actions Planned or Taken

Total Copper

Benchmark was exceeded during the following quarters:

- ☒ 1st quarter (January, February, March)
- ☒ 2nd quarter (April, May, June)
- ☒ 3rd quarter (July, August, September)
- ☐ 4th quarter (October, November, December)

Completed Actions

☒ Level 1 Corrective Action Date completed: 3/25/2024

Describe the additional *operational source control* BMPs implemented (Permit Condition S8.B):

Q1 Level 1 -In response to benchmark exceedances over time affiliated with scrap metal cargo operations and other concerns, the Port Commission terminated the lease with ABC Recycling on March 25, 2024 with provisions that the remaining stored scrap metal cargo would be removed by June 30, 2024.

Q2 Level 1 -Wattles in the heavy load area were removed and disposed of. Post cargo vacuum sweeping and detailed cleaning under the bullrail occurred in Basin 1. All wharf treatment units were cleaned and vacuumed out. Biochar and petroleum absorbing wattles were replaced in wharf treatment units. The Q2 Level 1 was completed by August 13, 2024.

Q3 Level 1 - Warehouse 1 gutters were cleaned and repaired, and targeted cleaning in Basins 1 and 2 was performed using a pressure washer and a vacuum sweeper to collect the washwater and residue. In Basin 3, a pile of rock cargo remnants was removed and the area was cleaned of all fines and sediment by manual sweeping. The Q3 Level 1 was completed by November 13, 2024.

Pending Actions

☐ Level 3 Corrective Action

Date completed: 9/30/2025

Describe the status of the corrective action:

Level 2 and 3 Corrective Actions were triggered in 2023. The Port submitted a Modification of Permit Coverage Form on April 18, 2024 requesting a time extension for completing the Level 2 and 3 Corrective Actions. On August 2, 2024, Ecology issued Administrative Order #23035 granting the extension. The Port has been implementing the Level 2/3 Corrective Actions in accordance with the approved schedule.

B1C treatment:

Treatment in this sub-basin involves relocation of the media filter baskets from the portion of the wharf undergoing reconstruction. The first unit was moved and installed prior to November 15, 2024. The installation locations for the remaining units were identified and the installation was completed on April 18th, 2025. The completion was temporarily slowed based on phasing of repairs to wharf structures below the planned locations of the Wharf Treatment Units.

B4A treatment and substantially identical treatment:

Biochar wattles were added to the media filter drain MFD inlets in B4A, and B3A through B3C in September 2024. Based on Ecology's input, the Port submitted a Sample Point Update form in June 2024 requesting to move the sampling point for these outfalls to B3C and began sampling there during Q3 2024.

B1D and B2A treatment:

Stormwater improvements for monitoring location B1D and Basin 2 are a major component of the ongoing wharf rehabilitation project. The Port initiated construction in June 2024. The deck surface of the wharf and the former stormwater conveyance system, including pipe, catch basins, and Contech stormwater filters were demolished in 2024. The new stormwater conveyance piping and catch basins have been installed in 2025. The Newterra Aquip stormwater treatment system was received and installed inside Warehouse 1 in 2025. Remaining work includes installing the wharf deck, installing the force main electrical components and control panel and installing the tidal gate at the outfall. This work is on track for completion by the September 30, 2025 deadline of the Administrative Order.

A standard Newterra Aquip O&M manual for the treatment system was submitted to the Port. The final customized O&M manual is being drafted and will be provided to the Port within 30 days after installation completion and commissioning of the treatment system for B1D and B2A.

No actions needed.

Total Zinc

Benchmark was exceeded during the following quarters:

- ☒ 1st quarter (January, February, March)
- ☒ 2nd quarter (April, May, June)

☒ 3rd quarter (July, August, September)

☐ 4th quarter (October, November, December)

Completed Actions

☒ Level 1 Corrective Action

Date completed: 3/25/2024

Describe the additional *operational source control* BMPs implemented (Permit Condition S8.B):

Q1 Level 1 -In response to benchmark exceedances over time affiliated with scrap metal cargo operations and other concerns, the Port Commission terminated the lease with ABC Recycling on March 25, 2024 with provisions that the remaining stored scrap metal cargo would be removed by June 30, 2024.

Q2 Level 1 -Wattles in the heavy load area were removed and disposed of. Post cargo vacuum sweeping and detailed cleaning under the bullrail occurred in Basin 1. All wharf treatment units were cleaned and vacuumed out. Biochar and petroleum absorbing wattles were replaced in wharf treatment units. The Q2 Level 1 was completed by August 13, 2024.

Q3 Level 1 - Warehouse 1 gutters were cleaned and repaired, and targeted cleaning in Basins 1 and 2 was performed using a pressure washer and a vacuum sweeper to collect the washwater and residue. In Basin 3, a pile of rock cargo remnants was removed and the area was cleaned of all fines and sediment by manual sweeping. The Q3 Level 1 was completed by November 13, 2024.

Pending Actions

☐ Level 3 Corrective Action

Date completed: 9/30/2025

Describe the status of the corrective action:

Level 2 and 3 Corrective Actions were triggered in 2023. The Port submitted a Modification of Permit Coverage Form on April 18, 2024 requesting a time extension for completing the Level 2 and 3 Corrective Actions. On August 2, 2024, Ecology issued Administrative Order #23035 granting the extension. The Port has been implementing the Level 2/3 Corrective Actions in accordance with the approved schedule.

B1C treatment:

Treatment in this sub-basin involves relocation of the media filter baskets from the portion of the wharf undergoing reconstruction. The first unit was moved and installed prior to November 15, 2024. The installation locations for the remaining units were identified and the installation was completed on April 18th, 2025. The completion was temporarily slowed based on phasing of repairs to wharf structures below the planned locations of the Wharf Treatment Units.

B4A treatment and substantially identical treatment:

Biochar wattles were added to the media filter drain MFD inlets in B4A, and B3A through B3C in September 2024. Based on Ecology's input, the Port submitted a Sample Point Update form in June 2024 requesting to move the sampling point for these outfalls to B3C and began sampling there during Q3 2024.

B1D and B2A treatment:

Stormwater improvements for monitoring location B1D and Basin 2 are a major component of the ongoing wharf rehabilitation project. The Port initiated construction in June 2024. The deck surface of the wharf and the former stormwater conveyance system, including pipe, catch basins, and Contech stormwater filters were demolished in 2024. The new stormwater conveyance piping and catch basins have been installed in 2025. The Newterra Aquip stormwater treatment system was received and installed inside Warehouse 1 in 2025. Remaining work includes installing the wharf deck, installing the force main electrical components and control panel and installing the tidal gate at the outfall. This work is on track for completion by the September 30, 2025 deadline of the Administrative Order.

A standard Newterra Aquip O&M manual for the treatment system was submitted to the Port. The final customized O&M manual is being drafted and will be provided to the Port within 30 days after installation completion and commissioning of the treatment system for B1D and B2A.

W1 treatment:

Oyster shell media was added to the downspout media filter units in June 2024. Galvanized roof downspouts were replaced in August 2023. The Port is currently working with a contractor to have the galvanized roof vents prepped and coated and expects to have the work completed after the seagull chick fledging window in late summer 2025.

No actions needed.

Total Lead

Benchmark was exceeded during the following quarters:

- ☒ 1st quarter (January, February, March)
- ☐ 2nd quarter (April, May, June)
- ☐ 3rd quarter (July, August, September)
- ☐ 4th quarter (October, November, December)

Completed Actions

☒ Level 1 Corrective Action

Date completed: 3/25/2024

Describe the additional *operational source control* BMPs implemented (Permit Condition S8.B):

Q1 Level 1 -In response to benchmark exceedances over time affiliated with scrap metal cargo operations and other concerns, the Port Commission terminated the lease with ABC Recycling on March 25, 2024 with provisions that the remaining stored scrap metal cargo would be removed by June 30, 2024.

Pending Actions

☐ Level 2 Corrective Action

Date completed: 9/30/2025

Describe the status of the corrective action:

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B1D and B2A treatment:

Stormwater improvements for monitoring location B1D and Basin 2 are a major component of the ongoing wharf rehabilitation project. The Port initiated construction in June 2024. The deck surface of the wharf and the former stormwater conveyance system, including pipe, catch basins, and Contech stormwater filters were demolished in 2024. The new stormwater conveyance piping and catch basins have been installed in 2025. The Newterra Aquip stormwater treatment system was received and installed inside Warehouse 1 in 2025. Remaining work includes installing the wharf deck, installing the force main electrical components and control panel and installing the tidal gate at the outfall. This work is on track for completion by the September 30, 2025 deadline of the Administrative Order.

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B4A treatment and substantially identical treatment:

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No actions needed.

Total Suspended Solids (TSS)

Benchmark was exceeded during the following quarters:

- ☒ 1st quarter (January, February, March)
- ☐ 2nd quarter (April, May, June)
- ☒ 3rd quarter (July, August, September)
- ☐ 4th quarter (October, November, December)

Completed Actions

☒ Level 1 Corrective Action

Date completed: 3/25/2024

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B1D and B2A treatment:

Stormwater improvements for monitoring location B1D and Basin 2 are a major component of the ongoing wharf rehabilitation project. The Port initiated construction in June 2024. The deck surface of the wharf and the former stormwater conveyance system, including pipe, catch basins, and Contech stormwater filters were demolished in 2024. The new stormwater conveyance piping and catch basins have been installed in 2025. The Newterra Aquip stormwater treatment system was received and installed inside Warehouse 1 in 2025. Remaining work includes installing the wharf deck, installing the force main electrical components and control panel and installing the tidal gate at the outfall. This work is on track for completion by the September 30, 2025 deadline of the Administrative Order.

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No actions needed.

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 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.

Dave Warter

4/22/2025

Signature

Date