Washington Department of Ecology
Electronic Submission Cover Letter

DEPARTMENT OF ECOLOGY
State of Washington

WQWebSubmittal - Submittal Submission Id: 1764556 - 3/24/2021 8:48:12 AM

Company Name	Signer Name	System Name
Port of Seattle	Sandra Kilroy	WQWebPortal

Attachments:

Document Name Or Description	Document Name
Submitted Copy of Record for Port of Seattle	Copy of Record PortofSeattle Wednesday March 24 2021
WAR044701_13a_03182021163328	2020PhaseIAnnualReport_Att1IDD_13a_03182021163328
WAR044701_39_03182021163511	2020PhaseIAnnualReport_Att2_S4_39_03182021163511

Attestation Agreed to at Signing:

I certify I personally signed and submitted to the Department of Ecology an Electronic Signature Agreement. I understand that use of my electronic signature account/password to submit this information is equal to my written signature. I have read and followed all the rules of use in my Electronic Signature Agreement. I believe no one but me has had access to my password and other account information.

I further certify: I had the opportunity to review the content or meaning of the submittal before signing it; and to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I intend to submit this information as part of the implementation, oversight, and enforcement of a federal environmental program. I am aware there are significant penalties for submitting false information, including possible fines and imprisonment.

For Ecology Use Only

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DEPARTMENT OF ECOLOGY
State of Washington

Water Quality Program

Permit Submittal Electronic Certification

Permittee: PORT OF SEATTLE

Permit Number: WAR044701 **Site Address:** PIER 69
Seattle, WA 98111

Submittal Name: MS4 Annual Report Phase I Ports

Version: 1 **Due Date:** 3/31/2021

Questionnaire

Number	Permit Section	Question	Answer
1	S9.E.5	Attach a notification of any jurisdictional boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period. per S9.E.5.	Not Applicable
2	S6.E.1.a	Made educational material available to tenants and employees. (S6.E.1.a)	Yes
3	S6.E.1.a	Made the annual report and most recent version of the SWMP Plan available on website. (S6.E.2)	Yes
4	S6.E.1.b	Complied with all relevant ordinances, rules, and regulations of the local jurisdiction(s) that govern non-stormwater discharges? (S6.E.3.a)	Yes
5	S6.E.2	Implemented policies to prohibit illicit discharges. (S6.E.3.b)	Yes
6	S6.E.3.b	Implemented an enforcement plan to ensure compliance with illicit discharge policies. (S6.E.3.b)	Yes
7	S6.E.3.c	Maintained mapping data for the features listed in S6.E.3.c?	Yes
8	S6.E.3.c	Mapped tributary conveyances and the associated drainage areas of MS4 outfalls with a 12 inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems? (S6.E.3.c.ii)	Yes
9	S6.E.3.c	Mapped known connections greater than or equal to 8 inches in nominal diameter to mapped tributary conveyances? (S6.E.3.c.iii)	Yes
10	S6.E.3.c	Implemented a program to document operation and maintenance records for stormwater treatment and flow control BMPs/facilities and catch basins? (S6.E.3.c.v)	Yes
11	S6.E.3.d	Conducted field screening of at least 20% of the MS4 to detect illicit discharges and illicit connections? (S6.E.3.d)	Yes
12	S6.E.3.d	Implemented procedures to identify and remove illicit discharges and illicit connections? (S6.E.3.d)	Yes
13	S6.E.3.d	Number of illicit discharges, including illicit connections, eliminated during the reporting period: (S6.E.3.d).	10

13a	S6.E.3.D	Attach a summary of illicit discharges discovered and actions taken to eliminate the discharges. (S6.E.3.d)	2020PhaseIAnnualReport_Att1IDD_13a_03182021163328
14	S6.E.3.E	Implemented a spill response plan that includes coordination with a qualified spill responder? (S6.E.3.e)	Yes
15	S6.E.3.E	Provided staff training or coordinated with existing training efforts to educate staff on proper BMPs for preventing illicit discharges and for identifying, reporting, and responding as appropriate? (S6.E.3.f)	Yes
16	S6.E.4	Complied with all relevant ordinances, rules, and regulations of the local jurisdiction(s) that govern construction phase stormwater pollution prevention measures? (S6.E.4.a)	Yes
17	S6.E.4	Ensured that all construction projects under the functional control of the Permittee obtained applicable NPDES permit coverage? (S6.E.4.b)	Yes
18	S6.E.4.a	Coordinated with local jurisdiction(s) on construction projects owned or operated by other entities that discharge into the Permittee's MS4? (S6.E.4.c)	Yes
19	S6.E.4.b	Provided staff training or coordinated with existing training efforts to educate staff on erosion and sediment control BMPs and requirements, or hired trained contractors to perform the work? (S6.E.4.d)	Yes
20	S5.E.4.c	Provided access, as requested, for inspection of construction sites under the functional control of the Permittee during land disturbing activities and/or the construction period? (S6.E.4.e)	Yes
21	S6.E.4.E	Complied with all relevant ordinances, rules, and regulations of the local jurisdiction(s) that govern post-construction stormwater pollution prevention measures, including proper operation and maintenance of the MS4? (S6.E.5.a)	Yes
22	S6.E.4.e	Coordinated with local jurisdiction regarding projects owned or operated by other entities which discharge into the Permittee's MS4? (S6.E.5.b)	Yes
23	S6.E.5.a	Implemented an operation and maintenance (O&M) manual for all stormwater treatment and flow control BMPs/facilities and catch basins? (S6.E.6.a)	Yes
24	S6.E.5.b	Updated the O&M manual following discovery or construction of new stormwater facilities? (S6.E.6.a.i)	Yes
25	S6.E.6.a	Updated maintenance standards, as necessary, per S6.E.6.a.ii?	Yes
26	S6.E.6.b	Inspected stormwater facilities listed in the O&M manual and took appropriate maintenance action? (S6.E.6.b)	Yes
26a	S6.E.6.b	Number of stormwater facilities inspected during the reporting period?	1836
26b	S6.E.6.b	Number of maintenance actions taken during the reporting period?	200

27	S6.E.6.c	Provided appropriate training for maintenance staff? (S6.E.6.c)	Yes
28	S6.E.6.d	Maintained records of inspections and maintenance activities? (S6.E.6.d)	Yes
29	S6.E.7	Updated Stormwater Pollution Prevention Plans (SWPPPs) as necessary? (S6.E.7.a)	Yes
30	S6.E.8	Inspected at least 20% of all sites covered by SWPPPs required under this permit? (S6.E.7.d.)	Yes
30a	S6.E.9	Number of sites covered under SWPPPs?	43
30b	S6.E.10	Number of sites inspected?	15
31	S6.E.11	SWPPPs include measures to prevent, identify and respond to illicit discharges, including illicit connections, spills and improper disposal? (S6.E.7.f)	Yes
32	S6.E.12	SWPPPs include a component related to inspection and maintenance of stormwater facilities and catch basins that is consistent with the O&M Program? (S6.E.7.g)	Yes
33	S7.A	Is there an approved Total Maximum Daily Load (TMDL) applicable to stormwater discharges from a MS4 owned or operated by the Permittee? (S7)	No
34	S7.A	Complied with the specific requirements identified in Appendix 2. (S7.A)	Not Applicable
35	S7.A	Attached status report of TMDL implementation. (S7.A)	Not Applicable
36	G20	Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware that the non-compliance has occurred. (G20)	Not Applicable
37	G3	Notified Ecology in accordance with G3 of any discharge into or from the Permittee's MS4 which could constitute a threat to human health, welfare, or the environment. (G3)	Yes
38	G3.A	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.	Yes
39	S4.F.3.d	If applicable, attached a summary of the status of implementation of any actions taken pursuant to S4.F.3, and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d)	2020PhaseIAnnualReport_Att2_S4_39_03182021163511
40	S8.A	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2019 (S8.A.1); and no later than August 15 of each subsequent year (S8.A.2.a.)?	Yes
42	S8.B	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2019 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)?	Yes

44	S8.B	If conducting a study per S.8.B.2.c, submitted a detailed effectiveness study proposal to Ecology no later than February 2, 2020? (S8.B.2.c.ii.(a))	Not Applicable
45	S8.B	If conducting a study per S.8.B.2.c, submitted a QAPP to Ecology within 120 days of Ecology's approval of the detailed effectiveness study proposal? (S8.B.2.c.ii.(b))	Not Applicable
46	S8.B	If conducting a study per S.8.B.2.c, began full implementation of the effectiveness in accordance with the schedule in the approved QAPP, and submitted required reports? (S8.B.2.c.ii.(c))	Not Applicable
47	S8.C	If conducting stormwater discharge monitoring in accordance with S8.C.2, submitted a QAPP to Ecology no later than February 1, 2020? (S8.C.2.c and Appendix 9)	Not Applicable
48	S8.C	If conducting stormwater discharge monitoring in accordance with S8.C.2, attach a data and analysis report per S8.C.2.d. and Appendix 9. (Due annually beginning March 31, 2021)	Not Applicable

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.

Sandra Kilroy

Signature

3/24/2021 8:48:11 AM

Date

Port of Seattle 2020 Annual Report
Phase I Municipal Stormwater Permit Number WAR044701
Attachment #1 - Illicit Discharges Identified and Resolved

Jurisdiction	POS Facility	Date incident discovered or reported to you	Date of beginning your response	Date of end of your response	Discharge to MS4? (select one)	*Incident Location*					How was the incident discovered or reported to you? (select all that apply)	*If 'Other', please describe*	Pollutants Identified (select all that apply)	*If 'Other', please describe*
						Address	City	Postal Code	Latitude	Longitude				
WAR044701	Terminal 102	1/6/2020	1/6/2020	1/7/2020	No – none found				47.569694	-122.347057	Staff referral		Fuel and/or vehicle related fluids	
WAR044701	Terminal 5	1/21/2020	1/21/2020	1/23/2020	Yes – notified Ecology				47.574236	-122.362579	ERTS referral		Sediment/soil	
WAR044701	Terminal 18	1/23/2020	1/23/2020	1/23/2020	Yes – notified Ecology				47.57787	-122.35255	Direct report to your staff		Fuel and/or vehicle related fluids	
WAR044701	Terminal 91 Uplands	1/24/2020	1/24/2020	1/27/2020	Yes – notified Ecology				47.63626	-122.3844	Staff referral		Fuel and/or vehicle related fluids	
WAR044701	Terminal 91 Uplands	3/11/2020	3/11/2020	3/11/2020	Yes – did not notify				47.64066	-122.38381	Staff referral		Other (please describe)	Soapy water

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						Address	City	Postal Code	Latitude	Longitude				
WAR044701	Jack Block Park	6/20/2020	6/20/2020	6/22/2020	No – none found				47.584886	-122.367943	Pollution hotline (phone, web, app); Other agency referral	Ecology	Unconfirmed, unspecified, or not identified	
WAR044701	Terminal 91 Uplands	7/1/2020	7/1/2020	7/1/2020	Yes – did not notify				47.63423	-122.38334	Direct report to your staff		Sewage/septage/pet waste/human waste; Other (please describe)	Fish processing waste
WAR044701	Terminal 5	7/16/2020	7/16/2020	7/16/2020	No – none found				47.57316	-122.36207	Other agency referral	City of Seattle	Fuel and/or vehicle related fluids	Coolant
WAR044701	Fisherman's Terminal	7/23/2020	7/23/2020	7/23/2020	Yes – did not notify				47.65776	-122.38253	Staff referral		Fuel and/or vehicle related fluids	
WAR044701	Terminal 91 Uplands	10/13/2020	10/13/2020	10/13/2020	Yes – did not notify				47.63363	-122.387113	Staff referral		Fuel and/or vehicle related fluids	

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Jurisdiction	POS Facility	Date incident discovered or reported to you	Source or Cause (select all that apply)	*If 'Other', please describe*	Source Tracing Approach(es) Used (select all that apply)	*If 'Other', please describe*	Correction/Elimination Methods Used (select all that apply)	*If 'Other', please describe*
WAR044701	Terminal 102	1/6/2020	Other (please describe)	Leaking vehicle	Observation (color/sheen/turbidity/floatables/odor)		Clean-up; Education/technical assistance	
WAR044701	Terminal 5	1/21/2020	Construction activity		Observation (color/sheen/turbidity/floatables/odor)		Clean-up; Add or modify operational source control BMP	
WAR044701	Terminal 18	1/23/2020	Other commercial/industrial activity		Observation (color/sheen/turbidity/floatables/odor)		Clean-up	
WAR044701	Terminal 91 Uplands	1/24/2020	Other commercial/industrial activity		Observation (color/sheen/turbidity/floatables/odor)		Clean-up; Education/technical assistance	
WAR044701	Terminal 91 Uplands	3/11/2020	Other commercial/industrial activity		Observation (color/sheen/turbidity/floatables/odor)		Clean-up; Education/technical assistance	

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Jurisdiction	POS Facility	Date incident discovered or reported to you	Source or Cause (select all that apply)	*If 'Other', please describe*	Source Tracing Approach(es) Used (select all that apply)	*If 'Other', please describe*	Correction/Elimination Methods Used (select all that apply)	*If 'Other', please describe*
WAR044701	Jack Block Park	6/20/2020	Unconfirmed, unspecified, or not identified		Observation (color/sheen/turbidity/floatables/odor)		Other (please describe)	None required. Not applicable.
WAR044701	Terminal 91 Uplands	7/1/2020	Other commercial/industrial activity; Other (please describe)	Sewer line blockage/ overflow	Observation (color/sheen/turbidity/floatables/odor); Map analysis		Clean-up	
WAR044701	Terminal 5	7/16/2020	Unconfirmed, unspecified, or not identified		Observation (color/sheen/turbidity/floatables/odor)		Clean-up	
WAR044701	Fisherman's Terminal	7/23/2020	Unconfirmed, unspecified, or not identified		Observation (color/sheen/turbidity/floatables/odor)		Clean-up	
WAR044701	Terminal 91 Uplands	10/13/2020	Vehicle-related business; Other (please describe)	Shipping truck missing fuel cap	Observation (color/sheen/turbidity/floatables/odor)		Clean-up	

Port of Seattle 2020 Annual Report
Phase I Municipal Stormwater Permit Number WAR044701
Attachment #1 - Illicit Discharges Identified and Resolved

Jurisdiction	POS Facility	Date incident discovered or reported to you	Field Notes, Explanations, and/or Other Comments
WAR044701	Terminal 102	1/6/2020	At approximately 10:00am on 1/6/2020, a sheen in the parking lot coming from a leaking white BMW was reported by Port of Seattle Marine Maintenance at Terminal 102. The product did not reach catch basins and catch basin #5509 was previously plugged as a preventive measure and thus prevented the leak from entering the stormwater system. Absorbent pads and booms were deployed under the vehicle and granular sorbents were applied to the parking lot and swept up. The Port of Seattle Stormwater Utility spoke to the owner of the vessel Olivia Rose who explained that the car belonged to his son's friend who was a guest (for liveaboard boat). Soon after, it was reported that a young man got intot he car and drove away. Marine Maintenance visitied the site again on the morning of 1/7/2020 to clean up remaining absorbent materials. The Stormwater Utility contacted the Port of Seattle facility manager to notify him of the situation associated with his customer.
WAR044701	Terminal 5	1/21/2020	On January 21, 2020, a Port contractor Orion Marine Contractors (Orion) observed a turbid discharge entering a catch basin (CB5671) north of the Transit Shed at Terminal 5 (T5) and reported the incident as ERTS #695822 located at 3443 W Marginal Way SW, Seattle, WA 98106. The source of the turbid water was sheet flow from a downspout over an exposed trench, which was part of an ongoing construction project for the T5 upgrade covered under Construction Stormwater General Permit number WAR307577 and Administrative Order 16571. On January 21, work associated with the construction project was taking place during a period with no stormwater discharge occurring from the site. Rain intensity unexpectedly increased at approximately 3:30-4:00 PM immediately after the trench was backfilled and prior to best management practices being put back into place. This resulted in the turbid discharge to CB5671, which entered the Port's MS4. Orion staff identified the turbid discharge at approximately 4:30 PM and immediately implemented control measures to stop turbid discharge to CB567. A turbidity measurement for the discharge was collected with results of 517 NTU. Changes to the area that caused the discharge included: 1) excavating the portion of the trench that had the Type 17 / Gravel Borrow backfilled to the top of existing asphalt to allow for any stormwater runoff from the Transit Shed to infiltrate into the water trench; 2) inspecting all compost socks along the water trench and verifying that the socks were installed correctly; and 3) sweeping the area with a sweeper truck to make sure that sediment removed from the asphalt. Additional best management practices included: 1) having a full-time vacuum sweeper truck onsite when work is taking place effective as of January 23, 2020; 2) ordering additional compost socks, sandbags, and plastic, held in dry storage, to maintain sufficient materials on-hand; and 3) conducting more "Toolbox" training for temporary erosion and sediment controls to educate the crews of what is required from Orion on the T5 project.
WAR044701	Terminal 18	1/23/2020	Hydraulic leak / equipment failure for top pick ID #59 belonging to SSA. The spill hit a trench drain (185127) and flowed into catch basin 3449. The elbow on the outlet of catch basin 3449 contained the spill and Port of Seattle Marine Maintenance cleaned the trench drain and catch basin 3449. The spill was reported to the required external agencies.
WAR044701	Terminal 91 Uplands	1/24/2020	On 1/23/2020, Port of Seattle Marine Maintenance identified a sheen at the Terminal 91 Uplands Marshalling Yard, coming from the Marine Service International (MSI) lease area. Marine Maintenance cleaned up the sheen and placed absorbent booms around catch 995. On 1/24/2020, Port of Seattle Stormwater staff investigated the site and found the leak had reoccurred and had entered the catch basin given the recent precipitation. Port Stormwater staff reported the incident to required agencies and contacted SeaOps, who in turn contacted MSI to notify them that the area must be cleaned up by 1/25/2020 at the latest. Marine Maintenance secured the site again with preventive absorbent materials and cleaned out the catch basin. On 1/27/2020, Port Stormwater staff returned to the site and found the situtation unresolved with a sheen still being generated. Port Stormwater staff met with Terminal 91 Operations at the site, and with MSI failing to respond to the Port, Marine Maintenance cleaned up the site before the forecasted rain in the afternoon. Marine Maintenance palletized and wrapped in plastic the 55-gallon drums and debris that were not secured by secondary containment. Terminal 91 Operations was notified that the tenant was responsible for removal of the pallets and to secure the drums with secondary containment. Terminal 91 Operations followed up with the tenant and the corrective action was completed.
WAR044701	Terminal 91 Uplands	3/11/2020	Port of Seattle Marine Maintenance discovered soapy water being discharged onto the ground at the Green Latrine leasehold by Green Latrine staff at 13:30 on 3/11/2020. The discharge entered catch basin #829 which was cleaned by Marine Maintenance at approximately 13:45. Port of Seattle staff notified Seattle Public Utilities, followed up with the Port of Seattle property manager, and provided technical assistance to the tenant.

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Phase I Municipal Stormwater Permit Number WAR044701
Attachment #1 - Illicit Discharges Identified and Resolved

Jurisdiction	POS Facility	Date incident discovered or reported to you	Field Notes, Explanations, and/or Other Comments
WAR044701	Jack Block Park	6/20/2020	At approximately 9:30am on 6/20/2020, the Washington Department of Ecology contacted the Port's spill hotline regarding a report of 2 gallons of a bluish-green oily material around an outfall at Jack Block Park north of Terminal 5 on 6/20/2020. Port of Seattle Marine Maintenance checked the reported area on 6/22/2020 beginning at 7:00am until 9:30am. The tide was +8 feet and dropping to +2 feet by the time the investigation was finished at 9:30am. Weather was dry overnight. Marine maintenance checked the waterway from the overlook and walked the beach, checking catch basin #9305. The only outfall in the area is a submerged combined sewer overflow. Marine Maintenance checked the drains leading to this outfall with no evidence of residue or illicit discharge. No further action was taken.
WAR044701	Terminal 91 Uplands	7/1/2020	At approximately 10:00am, Independent Packers requested Port assistance in cleaning catch basins #5163 and #1097 on the east side of building W-40 impacted by overflowing sewage/fish waste. Marine Maintenance responded, with tenant also having brought in contracted cleaning crews. Spill was resolved and tenant was advised on external agency spill reporting requirements by Port staff.
WAR044701	Terminal 5	7/16/2020	At approximately 8:00am on 7/16/2020, Port of Seattle Marine Maintenance was notified of a potential spill near the southeast corner of building W-6 at Terminal 5. Marine Maintenance investigated and found an antifreeze spill at the reported location, outside of the Terminal 5 boundary. The spill did not reach a drainage structure. Marine Maintenance cleaned the area with a vacuum truck.
WAR044701	Fisherman's Terminal	7/23/2020	At approximately 3:00pm on 7/23/2020, Marine Maintenance responded to a call from Port staff for a spill near the NW Dock at Fishermen's Terminal. Upon arrival, Marine Maintenance checked Catch Basin #4880 and found product floating. There was an outlet trap installed and appeared to have kept the material from the waterway. There was no sheen observed in the waterway nor the asphalt. The stained areas were very dry, not slippery and emitted very little odor. Marine Maintenance swept the area with the sweeper and then cleaned the affected catch basin. While cleaning, the asphalt started to erode, and the Environmental Compliance Manager was consulted. It was agreed that the spill was adequately addressed and cleaning was completed. The spill was reported to Seattle Public Utilities.
WAR044701	Terminal 91 Uplands	10/13/2020	At approximately 8:30am on 10/13/2020, Marine Maintenance responded to a spill near Marine Maintenance North Operations (MMNO). Diesel was spilled in drips along the bike path between MMNO and Terminal 91 Uplands into the intersection under Magnolia bridge. The area was approximately 400 feet long and traveled onto both properties. Absorbent was placed around and in the catch basins. Downturn elbows were present in the three catch basins in the area, keeping the spill contained in the catch basins. All three catch basins were cleaned and one line was jetted. Two catch basins had only a trace of diesel, while the third had diesel soaked into the preexisting insert. Absorbents, sweeper truck, and vacuum truck were used to clean the area. The Port reported the spill to Seattle Public Utilities.

Port of Seattle 2020 Annual Report

Phase I Municipal Stormwater Permit Number WAR044701

Attachment #2 – Summary of S4F Notifications

Terminal 5 Turbid Discharge

On January 21, 2020, a Port contractor Orion Marine Contractors (Orion) observed a turbid discharge entering a catch basin (CB5671) north of the Transit Shed at Terminal 5 (T5) and reported the incident as ERTS #695822 located at 3443 W Marginal Way SW, Seattle, WA 98106. The source of the turbid water was sheet flow from a downspout over an exposed trench, which was part of an ongoing construction project for the T5 upgrade covered under Construction Stormwater General Permit number WAR307577 and Administrative Order 16571. On January 21, work associated with the construction project was taking place during a period with no stormwater discharge occurring from the site. Rain intensity unexpectedly increased at approximately 3:30-4:00 PM immediately after the trench was backfilled and prior to best management practices being put back into place. This resulted in the turbid discharge to CB5671, which entered the Port's MS4. Orion staff identified the turbid discharge at approximately 4:30 PM and immediately implemented control measures to stop turbid discharge to CB567. A turbidity measurement for the discharge was collected with results of 517 NTU.

Changes to the area that caused the discharge included: 1) excavating the portion of the trench that had the Type 17 / Gravel Borrow backfilled to the top of existing asphalt to allow for any stormwater runoff from the Transit Shed to infiltrate into the water trench; 2) inspecting all compost socks along the water trench and verifying that the socks were installed correctly; and 3) sweeping the area with a sweeper truck to make sure that sediment removed from the asphalt.

Additional best management practices included: 1) having a full-time vacuum sweeper truck onsite when work is taking place effective as of January 23, 2020; 2) ordering additional compost socks, sandbags, and plastic, held in dry storage, to maintain sufficient materials on-hand; and 3) conducting more "Toolbox" training for temporary erosion and sediment controls to educate the crews of what is required from Orion on the T5 project.

On February 14, 2020, the Port submitted an S4F notification to the Washington Department of Ecology (Ecology) for this discharge. Ecology responded in a letter dated February 27, 2020 indicating that an adaptive management response under condition S4.F.3 was not necessary because the Phase I Permit's Stormwater Management Program requirements are designed to address illicit discharges from construction projects into the MS4.