



PORT OF BELLINGHAM
Washington State

STORMWATER MANAGEMENT PROGRAM PLAN

PHASE II MUNICIPAL STORMWATER PERMIT PROGRAM

**Port of Bellingham
1801 Roeder Avenue
P.O. Box 1677
Bellingham, Washington 98227**

Revised:

March 8, 2025

TABLE OF CONTENTS

1.0	INTRODUCTION	1
2.0	PUBLIC EDUCATION AND OUTREACH (S6.D.1)	5
2.1	STORM DRAIN LABELING (S6.D.1.a)	5
2.2	DISTRIBUTE EDUCATIONAL INFORMATION TO TENANTS AND RESIDENTS (S6.D.1.b).....	6
2.3	PUBLIC EDUCATION AND OUTREACH TASK STATUS.....	7
3.0	PUBLIC INVOLVEMENT AND PARTICIPATION (S6.D.2).....	8
4.0	ILLICIT DISCHARGE DETECTION AND ELIMINATION (S6.D.3).....	9
4.1	COMPLIANCE WITH NON-STORMWATER DISCHARGE REGULATIONS (S6.D.3.a).....	9
4.2	IDDE POLICY (S6.D.3.b).....	9
4.3	ILLICIT DISCHARGE POLICY ENFORCEMENT PLAN (S6.D.3.b) ..	10
4.4	STORM SEWER MAPPING (S6.D.3.c)	10
4.5	ILLICIT DISCHARGE INSPECTIONS (S6.D.3.d)	11
4.6	SPILL RESPONSE PLAN DEVELOPMENT AND IMPLEMENTATION (S6.D.3.e)	11
4.7	STAFF TRAINING ON BMPS FOR PREVENTING SPILLS AND ILLICIT DISCHARGES (S6.D.3.f)	11
4.8	IDDE TASK STATUS	12
5.0	CONSTRUCTION SITE STORMWATER RUNOFF CONTROL (S6.D.4) 13	
5.1	COMPLIANCE WITH CONSTRUCTION-PHASE STORMWATER POLLUTION PREVENTION REQUIREMENTS (S6.D.4.a).....	13
5.2	NPDES COVERAGE (S6.D.4.b)	13
5.3	COORDINATION WITH CITY OF BELLINGHAM, WHATCOM COUNTY, AND ECOLOGY ON TENANT PROJECTS (S6.D.4.c).....	14
5.4	EROSION CONTROL TRAINING (S6.D.4.d)	14
5.5	CONSTRUCTION SITE ACCESS (S6.D.4.e)	14
5.6	CONSTRUCTION SITE STORMWATER RUNOFF CONTROL TASK STATUS	14
6.0	POST-CONSTRUCTION STORMWATER MANAGEMENT FOR NEW DEVELOPMENT AND REDEVELOPMENT (S6.D.5).....	15
6.1	COMPLIANCE WITH POST-CONSTRUCTION STORMWATER POLLUTION PREVENTION REQUIREMENTS (S6.D.5.a).....	15
6.2	COORDINATION WITH CITY OF BELLINGHAM AND WHATCOM COUNTY ON TENANT PROJECTS (S6.D.5.b).....	15
6.3	POST CONSTRUCTION STORMWATER MANAGEMENT FOR NEW DEVELOPMENT AND REDEVELOPMENT TASK STATUS.....	15
7.0	POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS (S6.D.6)	16

7.1 OPERATIONS AND MAINTENANCE PLAN DEVELOPMENT (S6.D.6.a AND S6.D.6.c)16

7.2 NPDES COVERAGE FOR STORMWATER DISCHARGES (S6.D.6.b)17

7.3 EMPLOYEE TRAINING (S6.D.6.d).....17

7.4 POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS TASK STATUS18

APPENDIX A – ILLICIT DISCHARGE DETECTION AND ELIMINATION POLICY

APPENDIX B – PUBLIC OUTREACH MATERIAL

1.0 INTRODUCTION

The Port of Bellingham (Port) is a countywide special purpose district that operates the Bellingham Airport, Bellingham Cruise Terminal, Fairhaven Transportation Station, Squalicum and Blaine Marinas, and numerous diverse real estate business and industrial developments throughout Whatcom County as well as a network of public parks, trails and boat launches. The Port's mission is to promote sustainable economic development, optimize transportation gateways, and manage publicly owned land and facilities to benefit Whatcom County. The Port is committed to environmental stewardship of the surface water resources on and adjacent to properties owned by the Port. As part of this commitment, the Port obtained permit coverage in 2007 under the *Western Washington Phase II Municipal Stormwater Permit*¹ (Phase II Permit). An integral part of the Phase II Permit is the development and implementation of a Stormwater Management Program (SWMP) to reduce pollutant discharges and protect water quality. The Port's SWMP includes the actions to be taken to reduce pollutant discharges and protect water quality and responsibilities for implementation.

The Port is a Secondary Permittee under the Phase II Permit, which is issued by the Washington State Department of Ecology (Ecology). A Secondary Permittee is defined as “an operator of regulated small municipal separate storm sewer system which is not a city, town, or county.” The effective date of the Phase II Permit for the Port is May 14, 2007 (the date the Port received the initial notice of coverage from Ecology). The current permit became effective on August 1, 2024 and expires on July 31, 2029.

As developed by Ecology under the Federal Clean Water Act (CWA), the Phase II Permit for Western Washington applies to owners or operators of small municipal separate storm sewer systems (MS4s) in five counties, including Whatcom County. The geographic area of permit coverage for the Phase II Permit includes the entire incorporated area of Bellingham and its Urban Growth Area boundary. Port properties covered under the Phase II permit are identified by the yellow shaded areas on Figures 1 and 2 and include properties within the geographic area starting at the north end of the Bellingham International Airport and ending at the south end of Marine Park in Bellingham. Figure 1 highlights the covered area around the Bellingham International Airport, and Figure 2 highlights the covered area around Bellingham Bay, which includes Squalicum Harbor, Bellingham Shipping Terminal, Bellingham Cruise Terminal, and leased properties owned by the Port.

The purpose of the SWMP, as stated in the Phase II Permit, is to “reduce the discharge of pollutants from regulated small MS4s to the maximum extent practicable and protect water quality.” The Phase II Permit requires written documentation of the SWMP, called a SWMP Plan. The SWMP Plan is to be updated at least annually and posted on the Port's website. The SWMP Plan is intended to serve three purposes, each for a separate intended audience as summarized below:

- Ecology – To provide written documentation of Port compliance with permit requirements to develop and implement a SWMP;

¹ The permit is also known as the *National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit for Discharges from Small Municipal Separate Storm Sewers in Western Washington*

- The Public – To provide a means of soliciting input from the public on the SWMP; and
- Port Staff and Officials – To help build support for and understanding of the SWMP and to guide its implementation.

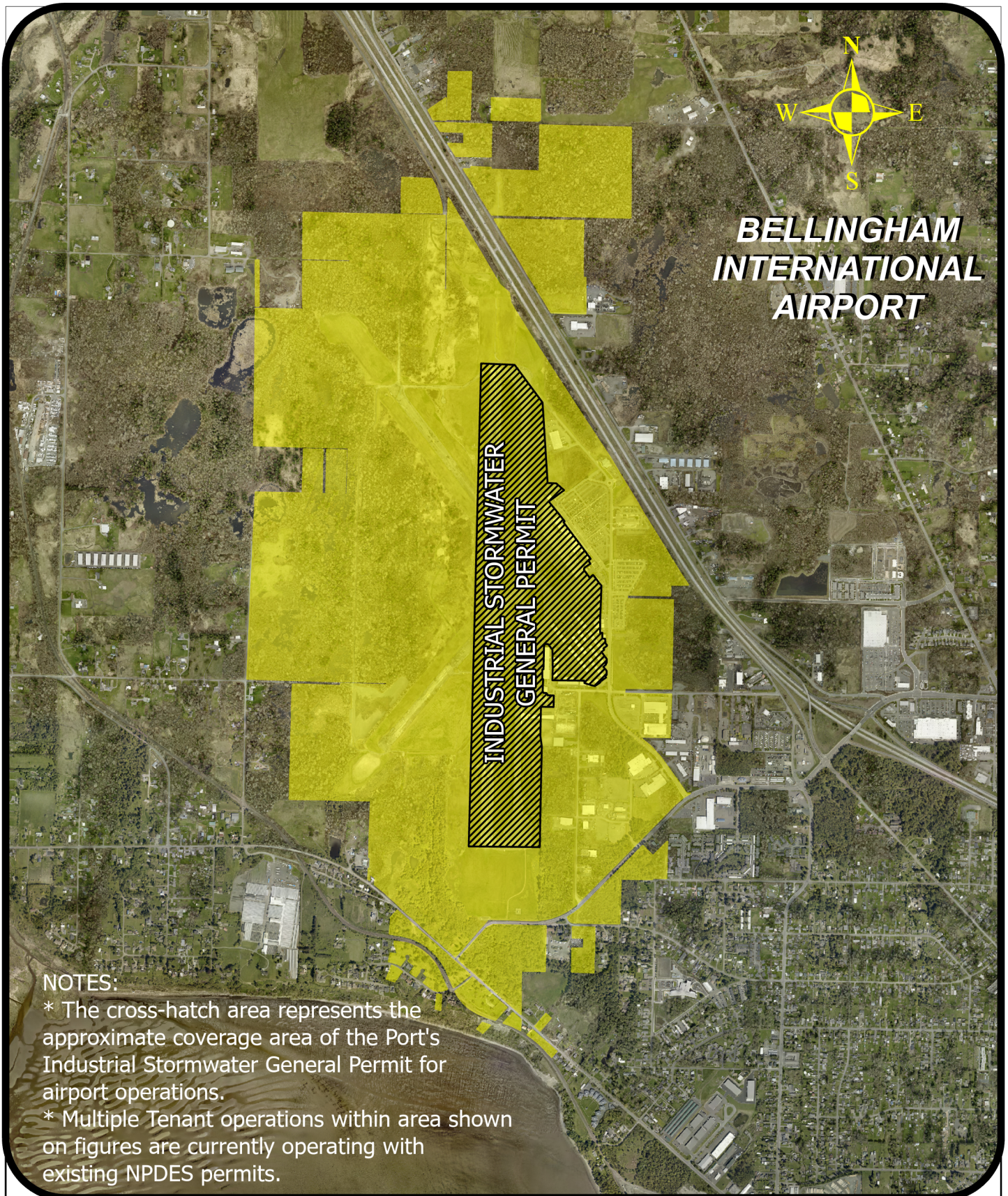
The Port will coordinate with the City of Bellingham and Whatcom County (primary permittees) as each agency manages their respective SWMPs. This coordination effort will provide efficient methods to implement permit requirements and limit unneeded redundancies. Permit compliant commitments will be captured by appropriate interagency agreements.

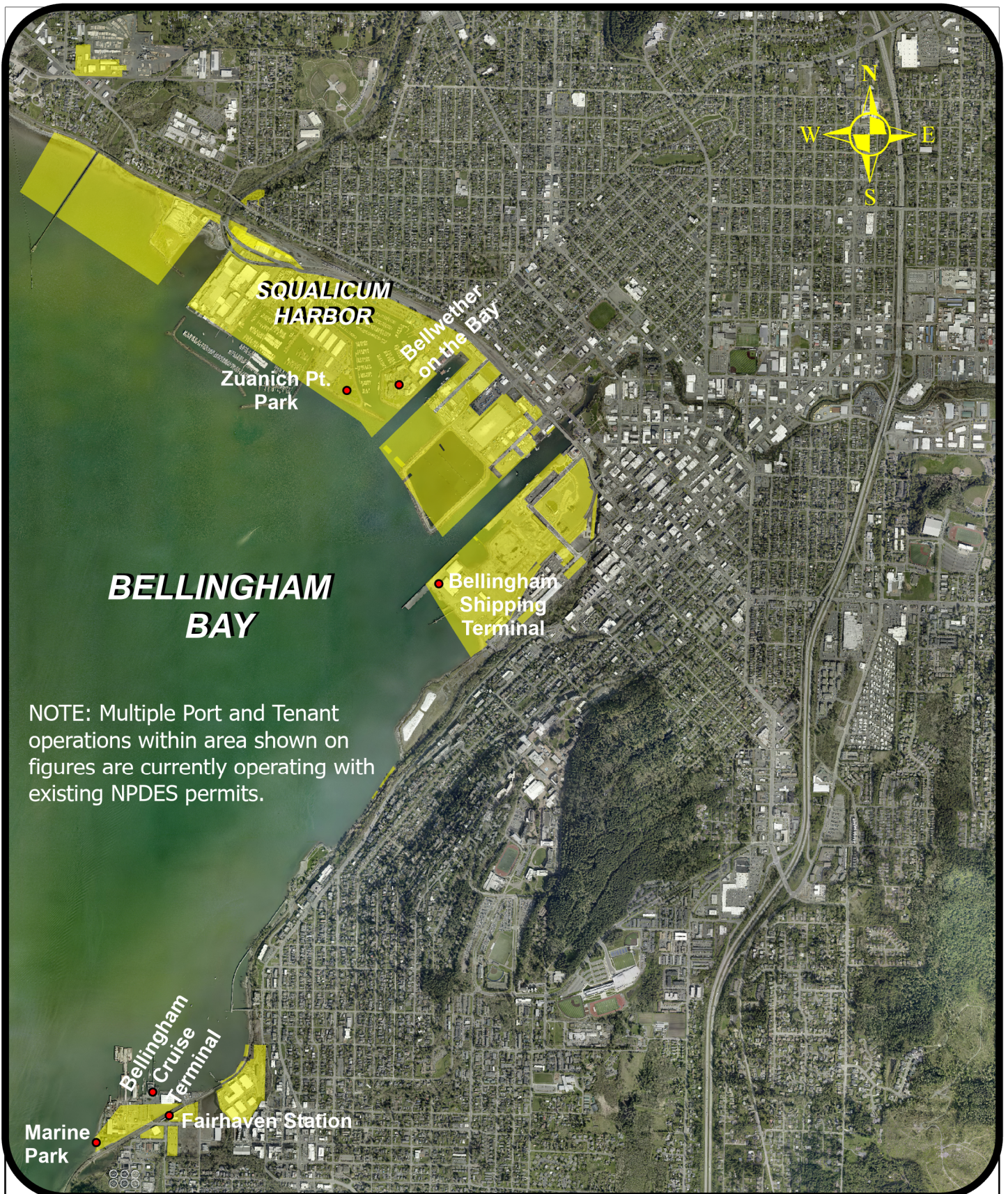
The Port has designated a Stormwater Manager to help coordinate stormwater management operations and planning for Port facilities and properties, and to oversee the development and implementation of the SWMP.

This SWMP Plan is organized according to the six components applicable to Secondary Permittees and described in the following sections:

- **Section 2** - Public Education and Outreach;
- **Section 3** - Public Involvement and Participation;
- **Section 4** - Illicit Discharge Detection and Elimination;
- **Section 5** - Construction Site Stormwater Runoff Control;
- **Section 6** - Post-Construction Stormwater Management for New Development and Redevelopment; and
- **Section 7** - Pollution Prevention and Good Housekeeping for Municipal Operations.

The applicable sections of the Phase II Permit are provided for reference in parentheses within each section heading below.





2.0 PUBLIC EDUCATION AND OUTREACH (S6.D.1)

Public education and outreach activities are an integral part of the Port's SWMP. Storm drain labeling and the distribution of educational information to tenants and users of Port facilities are the two components of the public education and outreach requirements applicable to Secondary Permittees under the Phase II Permit. Samples of public education and outreach materials used by the Port are included in Appendix B. The Port's strategies for implementing these components are discussed below.

2.1 STORM DRAIN LABELING (S6.D.1.a)

The Port's storm drain labeling program began in 2009 in coordination with the Port's preventative maintenance (PM) program and Environmental Compliance Assessment Program (ECAP). Storm drain inlets owned or operated by the Port in areas covered by the Phase II Permit and located in maintenance yards, in parking lots, along sidewalks, and at pedestrian access points have been labeled "No Dumping – Drains to Bellingham Bay" or "Only Rain...Down The Drain" with one of the two labels below.



A condition assessment of storm drain labels is performed subsequent to installation as part of the illicit discharge detection and elimination (IDDE) component of the Phase II Permit which is discussed in Section 4. A condition assessment is also conducted as part of the Port's regular PM and ECAP programs. Any label found to be no longer clearly visible during inspection, or as otherwise reported to the Port, is relabeled within 90 days.

The ECAP was established by the Port in the early 1990s to identify potential environmental problems on Port-owned land. The ECAP monitors compliance with local, state, and federal regulations and policies as part of Port operations and operations at Port tenant sites. On-site inspections are periodically performed at tenant properties and Port operations to provide guidance on environmental compliance issues and make recommendations in order to protect Port properties and the environment from potential commercial and industrial environmental impacts.

2.2 DISTRIBUTE EDUCATIONAL INFORMATION TO TENANTS AND RESIDENTS (S6.D.1.b)

The Port distributes educational information to tenants and residents annually on the impact of stormwater discharges on receiving waters and steps that can be taken to reduce pollutants in stormwater runoff. Different combinations of the following topics are to be addressed each year, where relevant, including:

- How stormwater runoff affects local water bodies;
- Proper use and application of pesticides and fertilizers;
- Benefits of using well-adapted vegetation;
- Alternative equipment and vehicle washing practices;
- Benefits of proper vehicle maintenance and alternative transportation choices; proper handling and disposal of vehicle wastes, including the location of hazardous waste collection facilities in the area;
- Hazards associated with illicit storm sewer connections and illicit discharges;
- Benefits of litter control and the proper disposal of pet waste;
- Source control BMPs for building materials to reduce pollution to stormwater including, but not limited to, stormwater pollution from PCB-containing materials.

The Port distributes educational information to Port tenants and the public via mailings, signage, postings, workshops, and/or personal contact. The types of outreach include the following:

- Port's ECAP with various stormwater brochures and one-on-one education of Port tenants
- Informational brochures provided in marina harbor offices
- Educational information in marina newsletters
- Referral to Disposal of Toxics for hazardous waste disposal, and PaintCare for paints.
- Green Marine certification program participant
- Clean Marina participant at both marinas
- Signage in public areas
- Educational displays and teaching modules at the Marine Life Center
- Port's website
- Social networks such as Facebook, Instagram and LinkedIn
- Press releases

- Workshops and lectures in coordination with other agencies/non-government organizations
- Personal contact with users/tenants as needed
- Annual stormwater trainings required for tenants operating at Port-held industrial stormwater permit locations.
- Other local municipalities' (including the [City of Bellingham](#), [City of Ferndale](#), [City of Lynden](#), and [Whatcom County](#)) stormwater educational programs via mailings, websites, signage, public presentations, newsletters, etc. Specific outreach information can be found in each respective municipality's SWMP, which is posted on their website.

NOTE: Most Port tenants/users are located within Phase II Permit boundaries of other municipalities such as the City of Bellingham, City of Ferndale, City of Lynden, and Whatcom County. These municipalities are required to perform stormwater outreach as part of the Phase II permit and, as a result, distribute educational information to most of the Port's tenants/users. Since the Port recognizes most of its tenants/users are receiving stormwater education from other municipal educational and outreach programs, the Port considers other municipal programs as part of the Port's overall educational and outreach program. However, the Port does not have specific agreements with other municipalities to distribute educational information to its tenants and residents and does not specifically rely on these programs to meet the compliance requirements of the Phase II Permit. To meet the compliance requirements of the Phase II Permit, the Port distributes educational information to residents and tenants as described in Section 2.2.

The Port may team with the [City of Bellingham](#), [City of Ferndale](#), [City of Lynden](#), and/or [Whatcom County](#) to distribute additional educational information to the general public, as needed. Any arrangements for joint implementation of the Port's Phase II Permit requirements will be documented by appropriate methods and included in subsequent revisions to this SWMP.

The Stormwater Manager will coordinate with internal staff for the distribution of educational information and may also coordinate with other municipalities. Appendix B contains a sample of the various outreach materials that the Port has used.

2.3 PUBLIC EDUCATION AND OUTREACH TASK STATUS

- On-going outreach and distribution of educational information as described above
- Reviewing annual program stormwater performance indicators in the Green Marine certification to determine opportunities for continuous improvement
- 2025 production of short outreach videos for use in social media and employee trainings
- Stormwater activity booth at Blue Tech by the Bay Maritime Career Fair, May 2025
- April 2025 Port hosting an Industrial Stormwater Permit training class open to the public and Port tenants

3.0 PUBLIC INVOLVEMENT AND PARTICIPATION (S6.D.2)

The Stormwater Manager coordinates public involvement and participation efforts. The most recent version of the Port's SWMP Plan and the most recent Annual Report are available to the public on the Port's web site at <http://www.portofbellingham.com/103/Stormwater-Management>. People are encouraged to review the SWMP Plan and Annual Report and to provide comments on the SWMP by email to stormwater@portofbellingham.com.

4.0 ILLICIT DISCHARGE DETECTION AND ELIMINATION (S6.D.3)

The IDDE requirements of the Phase II Permit require that the Port:

- Comply with relevant local ordinances, rules, and regulations governing non-stormwater discharges;
- Develop policies and an enforcement plan prohibiting illicit discharges from the storm sewer system;
- Develop a storm sewer system map for Port properties covered by the Phase II Permit;
- Conduct field inspections of outfalls;
- Develop and implement a spill response plan, and
- Provide staff training on best management practices (BMPs) for preventing spills and illicit discharges.

Each of the IDDE requirements is discussed below.

4.1 COMPLIANCE WITH NON-STORMWATER DISCHARGE REGULATIONS (S6.D.3.a)

The Port works closely with City of Bellingham, Whatcom County, and Ecology officials to ensure compliance with all relevant ordinances, rules, and regulations that govern non-stormwater discharges on Port properties. The Port's ECAP includes periodic inspections of Port and tenant facilities to identify potential compliance issues, track environmental permits, and where appropriate, provide recommendations for measures to mitigate potential environmental impacts from facility operations.

4.2 IDDE POLICY (S6.D.3.b)

In May 2008, the Port Board of Commissioners adopted appropriate policies prohibiting illicit discharges, which include possible enforcement mechanisms for those policies. The IDDE Policy is attached to the SWMP Plan as Appendix A. It is also available on the Port's website at:

<http://www.portofbellingham.com/103/Stormwater-Management>

The IDDE Policy will be updated as needed to ensure ongoing compliance with the requirements of the Phase II Permit. The Stormwater Manager is responsible for coordinating any required updates.

4.3 ILLICIT DISCHARGE POLICY ENFORCEMENT PLAN (S6.D.3.b)

The Port implements the IDDE Policy through the use of regular inspections, a spill response plan, and the training of appropriate staff. In the event of an illicit discharge, the Port's Stormwater Manager or designee shall implement the following procedures:

- The responsible party shall be contacted immediately to initiate appropriate procedures.
- For lease tenants, the Port's Real Estate Division is responsible for enforcement measures:
 - Port leases require tenants to comply with all local, state, and federal environmental regulations as well as all Port policies.
 - Any tenant responsible for an activity on Port property, which is, or may be, the source of an illicit discharge will be required to submit a written statement to the Port's Stormwater Manager describing the events surrounding the discharge and the BMPs or other measures which will be used to prevent a recurrence.
- For customers, users, and tenants of property managed by Port Operating Divisions other than Real Estate, which includes Marinas, Marine Terminals and Aviation, the affected Division is responsible for enforcement measures.
- If a repeat or continued violation of this policy is committed, the affected Port Operating Division shall enforce the terms of this Policy by any means it deems appropriate including, but not limited to:
 - bringing an action under any applicable provision contained in the lease or moorage agreement with the Port.
 - submitting to WA State Department of Ecology, the City of Bellingham, and/or Whatcom County for enforcement measures.
- If the illicit discharge appears to be in violation of City of Bellingham or Whatcom County illicit discharge ordinances, as applicable, the City of Bellingham or Whatcom County shall be notified.
- If a violation of this policy is committed by a person other than a Port customer, user, or tenant, the appropriate City of Bellingham, Whatcom County, or Ecology enforcement authorities shall be notified.
- Regardless of the source of an illicit discharge, if the discharge constitutes a threat to human health or the environment, Ecology will be notified per appropriate regulations.

4.4 STORM SEWER MAPPING (S6.D.3.c)

The IDDE requirements for the Phase II Permit include storm sewer system mapping. To meet the mapping requirement, the Port uses GIS software showing the locations of all known storm drain outfalls and discharge points, the associated receiving waters, and delineated areas that contribute runoff to each outfall. The Port's Engineering Division coordinates Port-wide utility mapping. The Environmental Planning Services Group coordinates with the Engineering Division on storm sewer system mapping utilizing consultant support as needed. Some of the storm sewer systems located on Port properties carry commingled stormwater from the City of Bellingham or

Whatcom County storm sewer systems; therefore, the Port coordinates its mapping efforts with these local government entities, as needed.

Upon completion of Port sponsored projects and the receipt of as-built drawings, the Port or its GIS consultant, will update any changes to the storm sewer utility maps. For non-Port sponsored projects on Port property, such as tenant projects, the Port will request, at a minimum, stormwater utility as-built drawings. Within a reasonable time upon receiving the as-built drawings, the Engineering Division or the Port's GIS consultant will update the Port's storm sewer utility maps.

4.5 ILLICIT DISCHARGE INSPECTIONS (S6.D.3.d)

The Port annually inspects a minimum of one-third (on average) of known storm drain outfalls through a combination of the PM program, the ECAP and other required inspections. When it is practical to partner with the City and/or the County for annual inspections, inspections may be completed in cooperation with the City and/or County. The details of the roles and responsibilities for the inspections along with any geographic distinctions are specified in the IDDE policies.

4.6 SPILL RESPONSE PLAN DEVELOPMENT AND IMPLEMENTATION (S6.D.3.e)

The Port has developed a Port-wide spill response plan, "Petroleum / Hazardous Materials Spill Response Plan", which is posted at all Port operating sites and includes a list of qualified spill responders. By reference, the spill response plan is incorporated into the SWMP. The Emergency Management/Security Officer periodically reviews the plan and provides updates as necessary. The Stormwater Manager will coordinate with the Emergency Management/Security Officer for stormwater related updates, as needed.

In addition to the spill response plan, the Port has an Emergency Operations Plan that provides response levels and details for a variety of disasters including spills. The Emergency Operations Plan details authorities, functions, and responsibilities to establish a cooperative plan of action. The plan establishes the use of the National Incident Management System as the Port's emergency response protocol.

4.7 STAFF TRAINING ON BMPS FOR PREVENTING SPILLS AND ILLICIT DISCHARGES (S6.D.3.f)

The Phase II Permit requires that Secondary Permittees provide staff training or coordinate with existing training efforts to educate relevant staff on proper BMPs to prevent spills and illicit discharges. Relevant staff includes Port employees who work outdoors, manage outdoor workers, oversee tenant operations, or negotiate with contractors who may be in a position to observe, correct, or report illicit discharges or spills that may affect storm water quality. This includes marina attendants, maintenance workers, airport technicians, landscape maintenance personnel, and others. Training is generally performed as part of regular safety and/or department meetings. Follow-up training is provided as needed to address changes in procedures, techniques, or permit requirements. The Stormwater Manager coordinates training efforts with the Port's management staff and maintains records of the staff trained and the training provided.

4.8 IDDE TASK STATUS

- On-going stormwater GIS mapping updates
- On-going participation in Whatcom County and North Sound stormwater permit coordinator meetings
- Reviewing annual program stormwater performance indicators in the Green Marine certification to determine opportunities for continuous improvement
- 2025 develop approach for the outfall reporting element in section S6.D3.cii of the Phase II permit
- Update of spill response plan in 2025
- 2025 development of an integrated Port-wide stormwater training plan

5.0 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL (S6.D.4)

The Phase II Permit has a number of requirements regarding construction stormwater runoff control that take effect from the date of permit coverage. These requirements include:

- Complying with all relevant ordinances, rules, and regulations of the local jurisdiction(s) that govern construction-phase stormwater pollution prevention measures;
- Obtaining coverage under the NPDES General Permit for Stormwater Discharges Associated with Construction Activities or an alternative individual NPDES Permit prior to discharging construction related stormwater;
- Coordinating with local jurisdictions regarding projects owned and operated by other entities which discharge into the Port MS4 to assist the local jurisdiction in achieving compliance with relevant ordinances, rules, and regulations of the local jurisdiction(s);
- Providing training and/or coordinating with existing training efforts to educate relevant staff in erosion and sediment control BMPs and requirements, or hiring trained contractors to do the work; and
- Coordination with Ecology or the local jurisdiction to provide access for inspection of construction sites or other land disturbances, which are under the functional control of the Port during the land disturbing activities and/or construction period.

The measures the Port has implemented to ensure compliance with these requirements are discussed below.

5.1 COMPLIANCE WITH CONSTRUCTION-PHASE STORMWATER POLLUTION PREVENTION REQUIREMENTS (S6.D.4.a)

The Stormwater Manager will meet, as needed, with Port Project Engineers who are responsible for construction project oversight to discuss their procedures for compliance with local ordinances, rules, and regulations governing construction-phase stormwater pollution prevention measures. The Port generally requires contractors of Port sponsored projects to be the permittee of the related Construction Stormwater General Permit (CSGP) and to maintain compliance with permit requirements.

For Port sponsored projects that do not require a CSGP, the Port will use BMPs for stormwater pollution prevention. Compliance with construction-phase stormwater pollution prevention is coordinated, as needed, with the City of Bellingham, Whatcom County, and/or Ecology.

5.2 NPDES COVERAGE (S6.D.4.b)

For all construction projects under the control of the Port, which require a construction stormwater permit, the Port or its contractor obtains coverage under the CSGP or an alternative individual NPDES permit prior to discharging construction related stormwater.

5.3 COORDINATION WITH CITY OF BELLINGHAM, WHATCOM COUNTY, AND ECOLOGY ON TENANT PROJECTS (S6.D.4.c)

The Port requires that plans for all tenant construction activities be submitted to the Port for review by an architectural review committee. As part of the construction approval process for tenant-owned or -operated projects, the Port requires that the tenant comply with all relevant ordinances, rules, and regulations regarding construction-phase stormwater pollution prevention measures. Depending on the size, nature, and location of the project, various Port representatives may work with tenants on tenant projects. Therefore, the Stormwater Manager will be the initial point of contact for the City of Bellingham, Whatcom County, and Ecology for any stormwater management-related compliance issues that may arise from Port tenant construction projects, unless otherwise noted in the tenant project permit. The Stormwater Manager will forward and/or coordinate compliance issues with the appropriate Port representative.

5.4 EROSION CONTROL TRAINING (S6.D.4.d)

The Port provides training to ensure that relevant staff members are educated in erosion and sediment control BMPs. Relevant staff members include maintenance personnel that may conduct or oversee excavation or other land disturbance activities or facilities/engineering personnel overseeing construction projects. Follow-up training is provided as needed to address changes in procedures, techniques, or requirements. The Port's Stormwater Manager documents and maintains records of the training provided and the staff trained.

5.5 CONSTRUCTION SITE ACCESS (S6.D.4.e)

The Port continues to coordinate with the City of Bellingham, Whatcom County, and/or Ecology to provide access, as requested, for inspection of construction sites or other land disturbance activities under the control of the Port during the land disturbance activities and/or construction period. The Stormwater Manager is the initial point of contact, unless otherwise noted in the project permit. The Stormwater Manager or alternate will coordinate site access as needed.

5.6 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL TASK STATUS

- On-going re-certifications for CESCL certified staff as required
- Initial CESCL training for new relevant staff as needed

6.0 POST-CONSTRUCTION STORMWATER MANAGEMENT FOR NEW DEVELOPMENT AND REDEVELOPMENT (S6.D.5)

The following section outlines the permit requirements for stormwater management for post-construction, new development, and redevelopment projects.

6.1 COMPLIANCE WITH POST-CONSTRUCTION STORMWATER POLLUTION PREVENTION REQUIREMENTS (S6.D.5.a)

The Port complies with local ordinances, rules, and regulations governing post-construction phase stormwater pollution prevention measures. Post-construction stormwater pollution prevention measures and compliance are coordinated through the Port's PM program. Post-construction BMPs are included in the Port's Municipal Stormwater Operation and Maintenance Plan. Through lease language, Port tenants are also required to comply with local ordinances, rules, and regulations governing post-construction phase stormwater pollution prevention measures.

6.2 COORDINATION WITH CITY OF BELLINGHAM AND WHATCOM COUNTY ON TENANT PROJECTS (S6.D.5.b)

Project Managers and Port operating division representatives are responsible to coordinate with local jurisdictions regarding projects owned and operated by other entities which discharge into the Port's MS4, to assist the local jurisdiction in achieving compliance with all relevant ordinances, rules, and regulations related to post-construction stormwater management for new development and redevelopment. Tenant environmental site visits through the ECAP (see Section 2.1) provide a means to detect stormwater management from post-construction tenant controlled projects. The ECAP also provides the Port with a process to assist its tenants to achieve compliance with all relevant ordinances, rules and regulations of local jurisdictions.

6.3 POST CONSTRUCTION STORMWATER MANAGEMENT FOR NEW DEVELOPMENT AND REDEVELOPMENT TASK STATUS

- 2025-2026 planned attendance and coordination at select City of Bellingham private stormwater system inspections

7.0 POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS (S6.D.6)

Pollution prevention measures and good housekeeping practices are key elements of the SWMP. The Phase II Permit requirements for pollution prevention and good housekeeping include:

- Development of a municipal Operations and Maintenance (O&M) Plan;
- Compliance with coverage requirements for the General NPDES Permit for Stormwater Discharges Associated with Industrial Activities (Industrial Stormwater General Permit [ISGP]); and
- Employee training.

7.1 OPERATIONS AND MAINTENANCE PLAN DEVELOPMENT (S6.D.6.a AND S6.D.6.c)

The Port has developed and implemented a “Municipal Stormwater Operation and Maintenance Plan” (O&M Plan) for Port facilities covered under the Phase II Permit to minimize stormwater pollution from activities conducted by the Port and its tenants. The O&M Plan establishes maintenance standards that are consistent with requirements specified in the Stormwater Management Manual for Western Washington as required by the Phase II Permit. By reference, the O&M Plan is incorporated into the SWMP. The O&M Plan includes appropriate pollution prevention and good housekeeping procedures for the following operations, activities, or types of facilities:

- Stormwater collection and conveyance systems – inspections, maintenance, cleaning, and waste disposal;
- Roads and parking lots – deicing, anti-icing, snow removal, snow disposal, materials storage, and all season BMPs to reduce the amount of road and parking lot debris entering the stormwater system;
- Vehicle fleets – storage, washing, and maintenance of fleet vehicles and fueling operations;
- External building maintenance – building exterior cleaning and maintenance activities including maintenance and management of dumpsters;
- Parks and open space – application of fertilizer, pesticides, and herbicides; sediment and erosion control; BMPs for landscape maintenance and vegetation disposal; and trash and pet waste management;
- Material storage facilities and heavy equipment maintenance or storage yards – develop Stormwater Pollution Prevention Plans for Port facilities not covered under the ISGP or other NPDES permit; and
- Other facilities that would reasonably be expected to discharge contaminated runoff.

The Port’s Maintenance Department is the primary Department for implementing the O&M Plan and coordinates updates to the plan with the Stormwater Manager. Documentation of facility inspections and maintenance performed by Port personnel are recorded in log books, which are

kept at the Port's maintenance facility. Log books are retained for 5-years. Stormwater infrastructure inspections are also recorded in the field using ArcGIS Survey 123. Additionally, all stormwater maintenance records can be accessed through the Port's time management and accounting systems (pre-2015 OSAS, 2015-2018 GP, currently Key2Act) under the stormwater PM work order(s). A limited subset of stormwater infrastructure is inspected by an engineering firm. Stormwater maintenance records are available to Ecology or to the public upon request.

7.2 NPDES COVERAGE FOR STORMWATER DISCHARGES (S6.D.6.b)

The Phase II Permit requires that the Port have permit coverage for all facilities operated by the Port that are required to be covered under the ISGP or another NPDES permit that authorizes discharges associated with the activity. The Port has ISGP coverage at the Bellingham International Airport and the Bellingham Shipping Terminal, NPDES Waste Discharge Permit coverage for a closed woodwaste landfill, and NPDES Waste Discharge Permit coverage for lagoon settling. The NPDES Permit compliance and reporting for these permits are per the Port's programs per the requirements of the respective permits.

Additionally, tenants that require coverage under an ISGP or another NPDES permit that authorizes stormwater discharges associated with the activity (i.e. individual, boatyard, etc.) are required to obtain and maintain these permits for their operations per their lease contract with the Port. The Port periodically reviews tenant activities and will notify its tenants of potential stormwater and/or discharge permit coverage requirements as part of the Port's ECAP.

7.3 EMPLOYEE TRAINING (S6.D.6.d)

The Port provides training to relevant staff whose construction, maintenance, or operational job functions may impact stormwater quality. The training addresses:

- The importance of protecting water quality;
- The requirements of the Phase II Permit;
- O&M requirements;
- Inspection procedures;
- Ways to perform their job duties in a manner that minimizes impacts to water quality; and
- Procedures for reporting water quality concerns, including potential illicit discharges (including spills).

Positions include marina attendants, maintenance workers, airport technicians, landscape maintenance personnel, security specialists, and others. Follow-up training is provided as needed to address changes in procedures, techniques, or requirements. The Port documents and maintains records of the training provided and the staff trained. The Stormwater Manager coordinates training efforts with the Port's management staff.

7.4 POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS TASK STATUS

- On-going evaluation of proposed new Port operations for the need for NPDES permit coverage
- Reviewing annual program stormwater performance indicators in the Green Marine certification to determine opportunities for continuous improvement
- On-going training of relevant staff on municipal stormwater permit requirements
- 2025 development of an integrated Port-wide stormwater training plan
- 2025 initial research to support structural source control BMP development related to potential PCBs in building materials per the 2024 Phase II permit

APPENDIX A – ILLICIT DISCHARGE DETECTION AND ELIMINATION POLICY

RESOLUTION NO. 1257

A RESOLUTION OF THE PORT COMMISSIONERS OF THE PORT OF BELLINGHAM ESTABLISHING A POLICY PERTAINING TO THE PROHIBITION OF ILLICIT DISCHARGE INTO MUNICIPAL SEPARATE STORM SEWER SYSTEMS LOCATED ON PORT PROPERTIES.

WHEREAS, the Washington State Department of Ecology issued the Western Washington Phase II Municipal Stormwater Permit on January 17, 2007; and

WHEREAS, the Port of Bellingham was granted coverage as a Secondary Permittee under the Western Washington Phase II Municipal Stormwater Permit by the Washington State Department of Ecology on May 14, 2007; and

WHEREAS, Special condition S6.D3.b of the permit requires all Secondary Permittees to adopt appropriate policies prohibiting illicit discharges and illegal dumping and identifying possible enforcement mechanisms for those policies; and

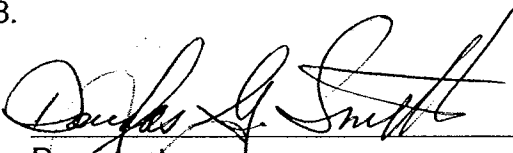
WHEREAS, virtually all existing Port lease agreements and all new lease agreements establish (1) the right of entry for inspection, (2) prohibit the existence of a condition of waste upon Port property, (3) prohibit the damage of Port property and (4) require the tenant to comply with all applicable laws and regulations, including all applicable environmental laws and regulations; and

WHEREAS, the Commission deems it necessary to establish a new policy to prohibit illicit discharges and illicit connections to the Port's stormwater system; and

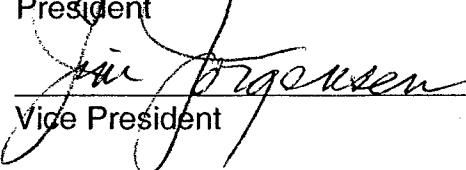
WHEREAS, the policy as proposed is in the best interest of public health and welfare;

NOW, THEREFORE, be it resolved that the Board of Commissioners of the Port of Bellingham hereby adopts the *Policy to Prohibit Illicit Discharges to Municipal Separate Storm Sewer System*, a copy of which is attached hereto as Exhibit A and by this reference incorporated herein.

ADOPTED by the Port Commission of the Port of Bellingham at the regular meeting thereof held this 20th day of May, 2008.



President



Vice President

Secretary

Exhibit A



Policy to Prohibit Illicit Discharges to Municipal Separate Storm Sewer System

I. PURPOSE/INTENT

The purpose of this Policy is to regulate non-stormwater discharges to the Port of Bellingham's MS4 to the maximum extent practicable as required by federal and state law. The objectives of this Policy are:

- A. To meet the requirements of the *Western Washington Phase II Municipal Stormwater Permit*;
- B. To regulate the introduction and contribution of unauthorized non-stormwater discharges to the MS4;
- C. To prohibit illicit connections and discharges to the MS4; and
- D. To establish institutional authority to carry out all inspection procedures necessary to ensure compliance with this Policy.

II. DEFINITIONS

- A. Best Management Practices. Schedules of activities, prohibitions of practices, general good house keeping practices, pollution prevention and educational practices, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants directly or indirectly to stormwater, receiving waters, or stormwater conveyance systems.
- B. BMPs – Best Management Practices
- C. Ecology. Washington State Department of Ecology.
- D. Illicit Connections. Any man-made conveyance that is connected to the MS4 without a permit, excluding roof drains and other similar type connections. Examples include sanitary sewer connections, floor drains, channels, pipelines, conduits, inlets, or outlets that are connected directly to the MS4.
- E. Illicit Discharge. Any discharge to the MS4 that is not composed entirely of stormwater except discharges covered by another NPDES permit (other than the Phase II Permit for discharges from the MS4) and discharges resulting from fire fighting activities.
- F. MS4. Municipal Separate Storm Sewer System.

- G. **Municipal Separate Storm Sewer System.** A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, pipes, curbs, gutters, ditches, man-made channels, or storm drains):
1. Owned or operated by the Port;
 2. Designed or used for collecting or conveying stormwater;
 3. Which is not a combined sewer; and
 4. Which is not part of a Publicly Owned Treatment Works as defined at Part 122.2 of Title 40 of the Code of Federal Regulations (40 CFR 122.2).
- H. **Non-Stormwater Discharge.** Any discharge to the MS4 that is not composed entirely of stormwater.
- I. **NPDES.** National Pollutant Discharge Elimination System.
- J. **Phase II Permit.** *Western Washington Phase II Municipal Stormwater Permit.*
- K. **Policy.** The Port's illicit discharge policy presented herein entitled *Policy to Prohibit Illicit Discharges to Municipal Separate Storm Sewer System.*
- L. **Port.** The Port of Bellingham
- M. **Premises.** Any leased, unleased, Port owned, and/or tenant owned building, lot, parcel of land, or portion of land whether improved or unimproved including adjacent sidewalks and parking strips.
- N. **Stormwater.** Runoff during and following precipitation and snowmelt events, including surface runoff and drainage.
- O. **Stormwater Manager.** The employee of the Port designated by the Port Executive Director to assist with the implementation of this Policy.

III. APPLICABILITY

This Policy shall apply to all water entering the Port's MS4 generated on the premises, unless explicitly exempted by an authorized enforcement agency. Non-stormwater discharges generated on property not owned by the Port and entering the Port's MS4 will be addressed with the local city or county jurisdiction.

IV. RESPONSIBILITY FOR ADMINISTRATION

Responsibility for administration, implementation, and enforcement of this Policy shall be with the Port Executive Director. The Port Executive Director will designate a Stormwater Manager to assist with the implementation of this Policy.

V. SEVERABILITY

The provisions of this Policy are hereby declared to be severable. If any provision, clause, sentence, or paragraph of this Policy or the application thereof

to any person, establishment, or circumstances shall be held invalid, such invalidity shall not affect the other provisions or application of this Policy.

VI. ILLICIT DISCHARGE PROHIBITIONS

No person shall discharge or cause to be discharged into the MS4 any materials other than stormwater except as provided in Sections VI.A and VI.B. The commencement, conduct, or continuance of any illegal discharge to the MS4 is prohibited except as described as follows:

A. The following discharges are exempt from this Policy:

1. Rising ground waters.
2. Uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20)).
3. Uncontaminated pumped ground water.
4. Foundation and footing drains.
5. Air conditioning condensation.
6. Irrigation water from agricultural sources that is commingled with urban stormwater.
7. Water from crawl space pumps.
8. Flows from riparian habitats, wetlands, springs, and diverted streams.
9. Non-stormwater discharges covered by another NPDES permit.
10. Discharges from emergency fire fighting activities.

B. The following discharges are allowable if the stated conditions are met:

1. Discharges from potable water sources, including water line flushing, hyperchlorinated water line flushing, fire hydrant system flushing, and pipeline hydrostatic test water are prohibited unless the discharge is first dechlorinated to concentration of 0.1 parts per million or less, pH-adjusted if necessary, and velocity controlled to prevent resuspension of sediments in the MS4.
2. Discharges from lawn watering and other irrigation runoff shall be minimized through use of water conservation practices and BMPs.
3. Street and sidewalk wash water, water used to control dust, and routine external building wash down that does not use detergents shall be minimized through use of water conservation practices and BMPs. At active construction sites, street sweeping shall be performed prior to washing the street.
4. Other non-stormwater discharges shall be in compliance with the requirements of a stormwater pollution prevention plan reviewed by the Port which addresses control of such discharges.

VII. ILLICIT CONNECTION PROHIBITIONS

The construction, use, maintenance, or continued existence of illicit connections to the MS4 is prohibited. This prohibition expressly includes, without limitation, illicit connections made in the past, regardless of whether the connection was permissible under law or practices applicable or prevailing at the time of connection. A person is considered to be in violation of this Policy if the person connects a line conveying any materials other than stormwater (except as provided in Sections VI.A and VI.B) to the Port's MS4, or allows such a connection to continue.

VIII. SPILLS, DUMPING, AND IMPROPER DISPOSAL

Spilling, dumping, or otherwise improperly disposing on the Premises of any material deemed a "hazardous material" under any federal, state, or local law or regulation is prohibited. Likewise, the dumping and improper disposal of litter and/or pet waste on the Premises is also prohibited.

IX. ENFORCEMENT AUTHORITY AND PROCEDURES

- A. Enforcement Authority. The Port Commission authorizes the Port Executive Director or his or her designee to administer the terms of this Policy by verbal or written instruction.
- B. Enforcement Procedures. In the event of an illicit discharge the Port shall implement the following procedures:
 - 1. The responsible party shall be contacted immediately to establish appropriate procedures.
 - 2. Any Port tenant responsible for an activity on Port property, which is, or may be, the source of an illicit discharge will be required to submit a written statement to the Port Stormwater Manager describing the events surrounding the discharge and the BMPs or other measures that will be used to ensure it will not reoccur.
 - 3. If a repeat or continued violation of this policy is committed by a Port tenant, the Port shall enforce the terms of this Policy by any means it deems appropriate including, but not limited to, bringing an action under any applicable provision contained in the lease between the Port and said tenant.
 - 4. If the illicit discharge appears to be in violation of the City of Bellingham or Whatcom County illicit discharge ordinances, as applicable, the City of Bellingham or Whatcom County shall be notified.
 - 5. If a violation of this policy is committed by a person other than a Port tenant, the appropriate City of Bellingham, Whatcom County, or Ecology enforcement authorities shall be notified.

X. ACCESS AND MONITORING OF DISCHARGES

- A. Applicability. This section applies to all facilities that the Stormwater Manager or his or her designee must inspect in order to ensure compliance with the provisions of this Policy, or whenever he or she has cause to believe that there exists, or potentially exists, in or upon any of the Port's Premises any condition which constitutes a violation of this Policy.
- B. Access to Facilities. The Port Stormwater Manager or his or her designee shall have the authority to inspect any and all Port or Port tenant facilities that are subject to this Policy as often as may be necessary to determine compliance with this Policy. If a discharger has security measures in force which require proper identification and clearance before entry into a Port tenant building or property, the discharger shall make the necessary arrangements to allow access. The Port Stormwater Manager or his or her designee will coordinate access to Port tenant facilities for any required inspections by the City of Bellingham or Whatcom County illicit discharge detection and elimination programs.

XI. ADOPTION OF POLICY

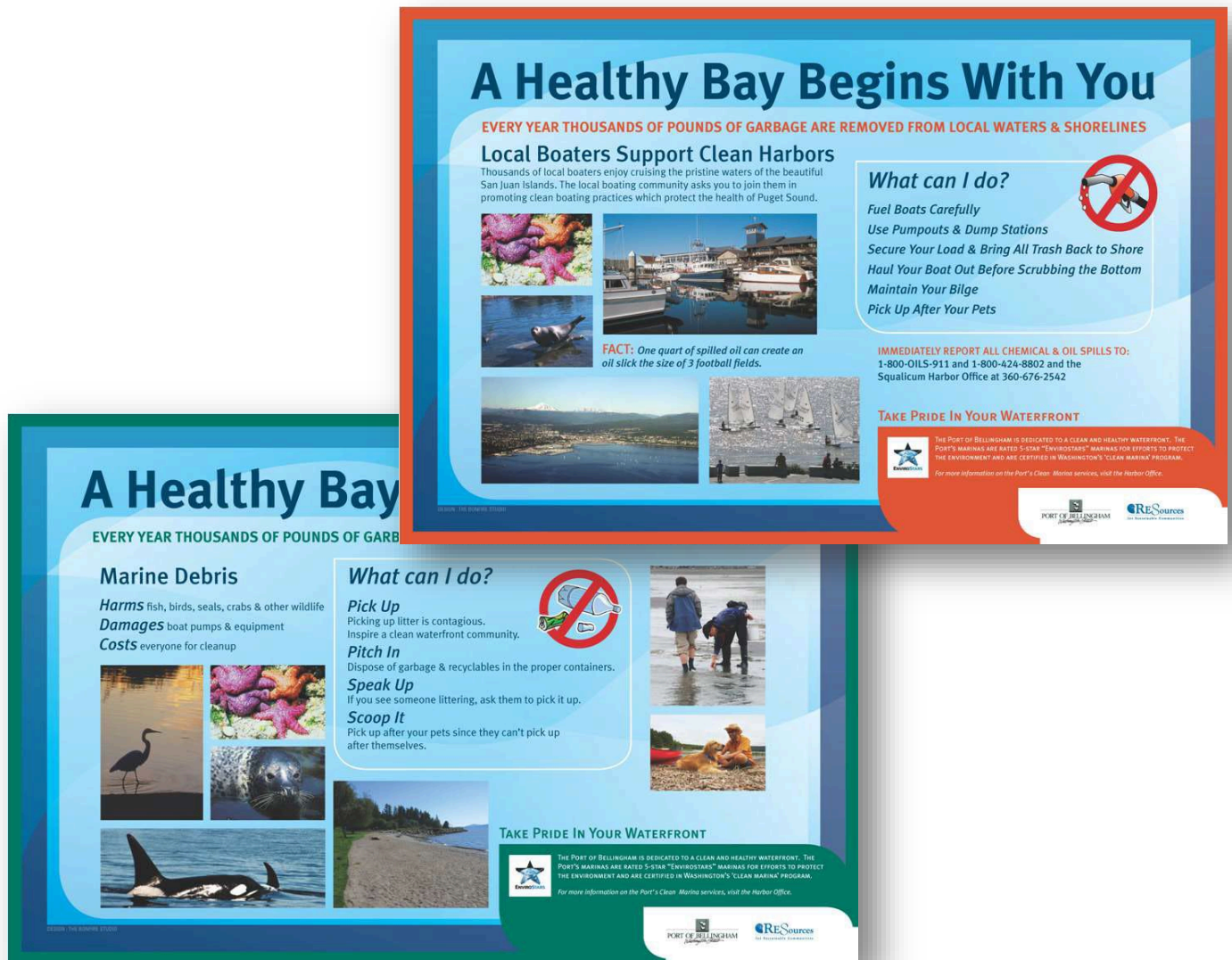
This Policy shall be in full force and effect immediately and will be posted on the Port's website.

APPENDIX B – PUBLIC OUTREACH MATERIALS

APPENDIX B – PUBLIC OUTREACH MATERIALS

This section includes a sample of outreach materials used by the Port.

The Port partnered with ReSources for Sustainable Communities (a local, non-profit environmental education organization) to develop the following two educational signs in support of clean harbors. The messages include stormwater-related topics such as pet waste and litter control. The signs have been posted at the Port's marinas and park facilities.



The Port distributes the following or similar stormwater outreach pamphlets to tenants during ECAP site visits and community events.



10 Things You Can Do to Prevent Stormwater Runoff Pollution

- Use fertilizers sparingly and sweep up driveways, sidewalks, and roads
- Never dump anything down storm drains
- Vegetate bare spots in your yard
- Compost your yard waste
- Avoid pesticides; learn about Integrated Pest Management (IPM)
- Direct downspouts away from paved surfaces
- Take your car to the car wash instead of washing it in the driveway
- Check car for leaks, and recycle motor oil
- Pick up after your pet
- Inspect and pump your septic tank regularly

EPA United States Environmental Protection Agency
 For more information, visit www.epa.gov/nps or www.epa.gov/npsdes/stormwater



Polluted runoff is making Bellingham's creeks, lakes, and Bellingham Bay unsafe for people, pets, and wildlife.

Stormwater picks up harmful bacteria, pesticides, metals, vehicle fluids, and other pollutants from our streets, yards, and homes, then washes down ditches and drains directly to the nearest waterway, often without any treatment. Stormwater is the nation's number one source of water pollution.

Spills happen! Help us find them.
 If you see or smell oil, paint, suds, or sewage in drains, ditches, or waterways, contact the
Pollution Hotline
(360) 778-7979
stormwaterhotline@cob.org

We'll take a look and use it as an opportunity to teach others about preventing polluted runoff.

CITY OF BELLINGHAM WASHINGTON **Puget Sound Starts Here.org**

www.cob.org/cleanwater

Prevent Polluted Runoff

Scoop the Poop
 PET WASTE CAN SPREAD DISEASES TO PEOPLE, PETS, & WILDLIFE.
 Scoop dog poop, bag it, and put it in the trash:

- At home, scoop at least weekly, and especially before it rains.
- On walks, scoop every time, take trash home, and watch closely when off leash.

www.cob.org/scoop poop

Maintain Your Car
 SOAP, METALS, CHEMICALS, & AUTO FLUIDS HARM AQUATIC LIFE.

Wash Right:

- Take your car to a car wash. There, water is reused then treated with other sewage.
- If washing at home, wash on the lawn. Make sure the wash water soaks into the ground.

Don't Drip and Drive:

- Check your car for leaks quarterly.
- Fix leaks as soon as possible.

www.fixcarleaks.org

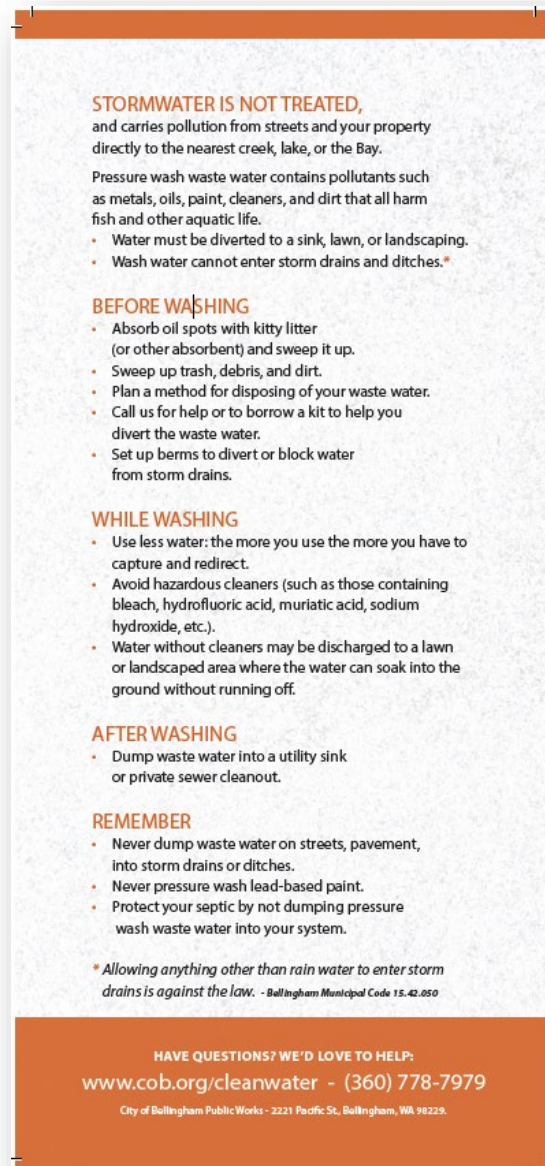
Landscape Wisely
 EXCESS NUTRIENTS AND PESTICIDES DEGRADE FISH HABITAT.

Five steps to natural yard care:

- Build healthy soil.
- Plant right for your site.
- Practice smart watering.
- Think twice before using pesticides.
- Practice natural lawn care.

www.naturallyardcare.info

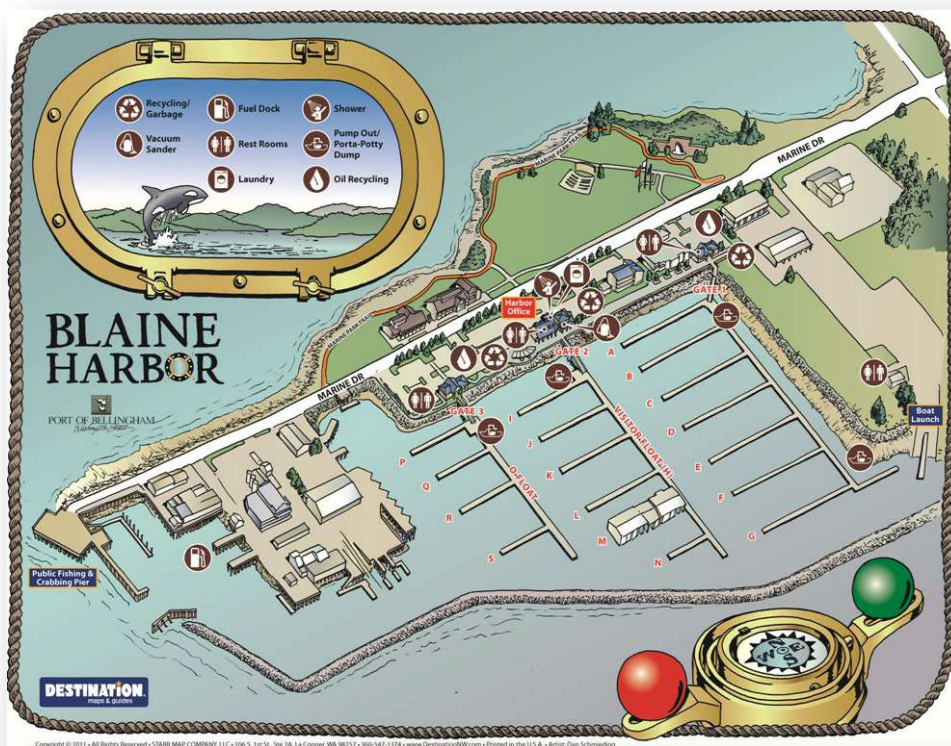
The Port partnered with the City of Bellingham to customize this rack card on pressure washing BMPs to be distributed to tenants and at events.



The Port developed the following handouts for the boating community. The handouts promote boaters to use clean boating BMPs, which includes picking up after pets. The handouts are also available on the Port's website:

[Green Boating, Business & Events | Port of Bellingham, WA - Official Website](https://www.portofbellingham.com/97/Green-Boating-Business-Events)

<https://www.portofbellingham.com/97/Green-Boating-Business-Events>





BLAINE HARBOR
Port of Bellingham

235 Marine Drive
PO Box 1245
Blaine, WA 98230
www.portofbellingham.com

Harbor Master.....360-647-6176
US Coast Guard.....360-734-1692
VHF Monitor Channels.....16 & 68



ENVIROSTARS



CLEAN MARINA
WASHINGTON
EMERGENCY CERTIFIED

Blaine Harbor Supports Clean, Green Boating



What can I do?

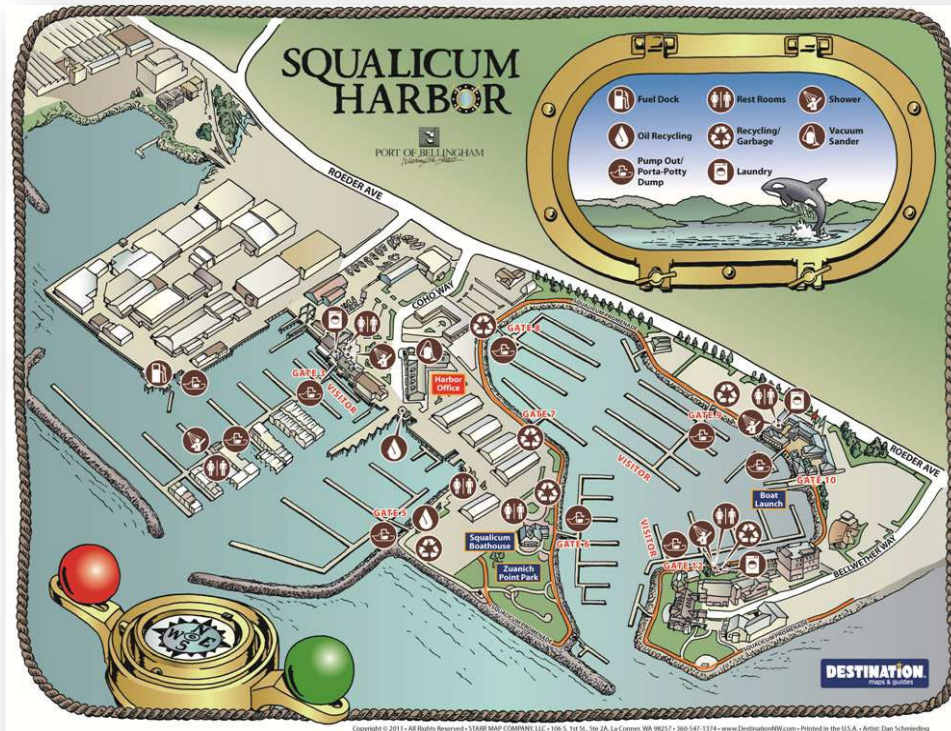
- Use Our Clean Marina Facilities
- Fuel Boats Carefully
- Use Pumpouts & Dump Stations
- Secure Your Load & Bring All Trash to Shore
- Maintain Your Bilge
- Pick Up After Pets On Docks and On Shore
- Learn More: Visit www.portofbellingham.com and Search 'Green Boating'



REPORT ALL SPILLS

- * Call 911, if necessary
- * Notify the Harbor Master at 360-647-6176 (after-hours 360-303-7110)
- * Report spill to the US Coast Guard at: 800-424-8802
- * Report spill to the Washington Division of Emergency Management at: 800-645-7911

We bid you safe and pleasant cruising through one of the richest marine ecosystems in the world. Please do your part to protect the beauty and splendor of the Salish Sea so the next generation of mariners can enjoy it as we do.





SQUALICUM HARBOR
Port of Bellingham

722 Coho Way
Bellingham, WA 98225
www.portofbellingham.com

Harbor Master.....360-676-2542
US Coast Guard.....360-734-1692
VHF Monitor Channels.....16 & 68



ENVIROSTARS



CLEAN MARINA
WASHINGTON
GreenBoating Certified

Squalicum Harbor Supports Clean, Green Boating



What can I do?

- Use Our Clean Marina Facilities
- Fuel Boats Carefully
- Use Pumpouts & Dump Stations
- Secure Your Load & Bring All Trash to Shore
- Maintain Your Bilge
- Pick Up After Pets On Docks and On Shore
- Learn More: Visit www.portofbellingham.com and Search 'Green Boating'



REPORT ALL SPILLS

- * Call 911, if necessary
- * Notify the Harbor Master at 360-676-2542 (after-hours 360-739-8131)
- * Report spill to the US Coast Guard at: 800-424-8802
- * Report spill to the Washington Division of Emergency Management at: 800-645-7911

We bid you safe and pleasant cruising through one of the richest marine ecosystems in the world. Please do your part to protect the beauty and splendor of the Salish Sea so the next generation of mariners can enjoy it as we do.

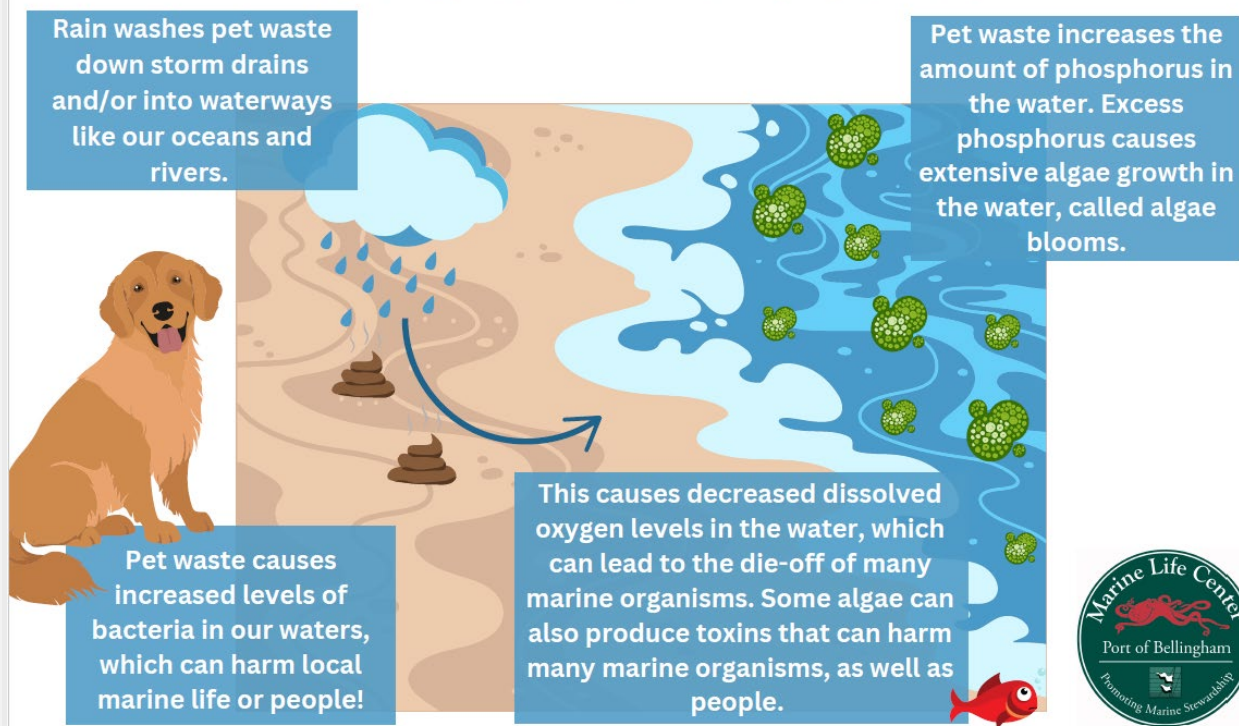


The Port's s Marine Life Center conducts education on diverse topics including stormwater protection and has over 37,000 visitors annually. This example of an interactive game highlights the center's outreach on the impact of pet waste on marine water quality and sea life.



WHY SHOULD YOU SCOOP DOG POOP?

WHAT DOES DOG POOP HAVE TO DO WITH THE OCEAN?



The Port engages the public through social media on stormwater protection and other environmental stewardship topics.



The Port encourages alternative options for local Port business travel through the purchase of 2 E-bikes. Two all-electric trucks were added further reducing emissions. The Port has been a Whatcom Smart Trips partner for over 10 years and supports employee carpooling, bus commuting and participation in Bike-to-Work Day. Port employees completed 843 smart trips in 2024.



The Port conducted four beach clean-ups around Bellingham Bay in 2024.



The Port added educational stickers to existing pet waste bag stations to raise visibility and promote pet waste clean-up. New signage raises awareness at Port parks encouraging patrons to pack out their trash and pick up after pets.



The Port Marina Division publishes a quarterly newsletter that includes various educational information consistent with the following:



Tips to Avoid Fuel Spills

Help us prevent accidental fuel discharges into our marine waters by observing the following Best Management Practices (BMP's):

- **DO NOT** top off fuel tanks. Leave some room for fuel expansion. Expanding fuel can leak out of caps fuel fittings, and vents finding its way into your bilge or marine waters.
- Use caution when leaving portable gas tanks and fuel hoses in the sun.
- Make sure to adjust the vent on portable fuel tanks to allow built up pressure to escape.
- Disconnect outboard fuel hoses when not in use.
- If you see a spill, please report it to the harbor office immediately.



Harbor Garbage and Recycling Services

In addition to accepting garbage and recycling generated aboard your boat, the harbors also recycle small amounts of boat related engine oil, spent antifreeze, bilge water, and old gasoline and diesel fuel. The harbor staff is also able to provide you resources for the disposal of additional items such as paint and chemicals. To help manage our garbage and recyclables, we'd like to remind everyone that only boating-related trash can go in the dumpsters. Please do not bring trash from home. If you suspect someone is dumping household garbage, please notify the harbor office with a description of the vehicle and the license plate number so staff can follow-up on the report.

Enthusiastic Port stormwater staff entered the Port's annual Halloween costume contest to represent and advocate for clean stormwater.

