WORKING WATERFRONTS AND REGULATORY CONSTRAINTS: A COLLABORATIVE APPROACH

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Tacoma, Washington
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Waterfront industries vital to Pacific Northwest
Increasing regulatory constraints
Waterfront use must coexist successfully
Limited real estate
Some success stories
Some success stories
Case Study: Stormwater compliance in Washington State
### Table 2: Benchmarks and Sampling Requirements Applicable to All Facilities

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Units</th>
<th>Benchmark Value</th>
<th>Analytical Method</th>
<th>Laboratory Quantitation Level</th>
<th>Minimum Sampling Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Turbidity</td>
<td>NTU</td>
<td>25</td>
<td>EPA 180.1 Meter</td>
<td>0.5</td>
<td>1/quarter</td>
</tr>
<tr>
<td>pH</td>
<td>Standard Units</td>
<td>Between 5.0 and 9.0</td>
<td>Meter/Paper</td>
<td>±0.5</td>
<td>1/quarter</td>
</tr>
<tr>
<td>Oil Sheen</td>
<td>Yes/No</td>
<td>No Visible Oil Sheen</td>
<td>N/A</td>
<td>N/A</td>
<td>1/quarter</td>
</tr>
<tr>
<td>Copper, Total</td>
<td>μg/L</td>
<td>Western WA: 14 Eastern WA: 32</td>
<td>EPA 200.8</td>
<td>2.0</td>
<td>1/quarter</td>
</tr>
<tr>
<td>Zinc, Total</td>
<td>μg/L</td>
<td>117</td>
<td>EPA 200.8</td>
<td>2.5</td>
<td>1/quarter</td>
</tr>
</tbody>
</table>

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The Permittee shall ensure laboratory results comply with the *quantitation level* specified in the table. However, if a Permittee knows that an alternate, less sensitive method (higher detection level and *quantitation level*) from 40 CFR Part 136 is sufficient to produce measurable results in its effluent, it may use that method for analysis.

1/quarter means 1 sample taken each quarter, year-round.

Permittees shall use either a calibrated pH meter or narrow-range pH indicator paper with a resolution not greater than ± 0.5 SU.
BENCHMARKS DIFFICULT TO ACHIEVE

- 3 years into permit – roughly 67% of facilities routinely exceeding permit limits.
- Many facilities now at Level 3 phase requiring evaluation and installation of stormwater treatment.
Stormwater treatment—can occupy large footprint on a small site
Significant disruption during construction
FOCUS ON INDIV. INDUSTRIAL PARCELS ILLOGICAL

- Zinc, turbidity, and copper primary concerns
- All three are associated with releases from vehicles – tires, fuels, brakes – in addition to industrial sources
- Washington State facilities under SIC codes such as bus barn, marine cargo handling, general warehousing, and trucking companies are in the top 15 industry types exceeding ISWGP benchmarks
ISWGP facilities in South Seattle
Map of ISWGP coverage – by parcels
Map of ISWGP coverage – with public ownership
NEW APPROACH NEEDED – MULTI-PARTY BASIN-WIDE TREATMENT

- Define industrial basins and ID contributors – including streets
- Basin organized like utility district – new entity representing basin contributors and with responsibilities
- Centralized treatment locations – most likely on public land
- Discharges routed to central treatment
- Central treatment = economy of scale
MULTI-PARTY BASIN TREATMENT (CONT).

- More sustainable, efficient, treatment systems possible – green infrastructure alternatives
- Provides NPDES permit holders benefits
- Reduces loading from basin to receiving waters
- Maximizes private and public funding opportunities
Low impact development options
MULTI-PARTY BASIN TREATMENT (CONT).

- Would require a new permitting class
- Could be based on other “utility district” constructs to share costs and liabilities
- Municipalities would need permit modifications – areas carved out of muni permits
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