

Port of Vancouver Illicit Discharge Detection and Elimination (IDDE) Policy

Purpose

Under the Western Washington Phase II NPDES Municipal Stormwater Permit (S6.D.3.b), the Port of Vancouver (POV) is required to develop and adopt appropriate policies prohibiting illicit discharges and illegal dumping to POV's separate storm sewer system. The permit also requires the POV to develop and implement an enforcement plan using identified enforcement mechanisms to ensure compliance with the illicit discharge policy.

The purpose of this IDDE policy is to protect the water quality and public health and safety on and around the Port of Vancouver, and to meet all requirements of the POV's Phase II Municipal Stormwater Permit. This policy addresses the following discharges to the POV's separate storm sewer system: illicit connections and non-stormwater discharges including spills of hazardous materials and improper disposal of pet waste and litter.

Illicit Connections

Illicit connections include any manmade conveyances connected to the POV's municipal separate storm sewer system without a permit, excluding roof drains and all other similar type connections. Examples of illicit connections include, but are not limited to: sanitary sewer connections, floor drains, channels, pipelines, conduits, inlets, or outlets that are connected directly to the POV's municipal separate storm sewer system.

It is POV policy that no illicit connections to the POV's municipal separate storm sewer system are permitted. This includes, but is not limited to, the construction, use, maintenance or continued existence of illicit connections to the storm drain system. This prohibition expressly includes, without limitation, illicit connections made in the past, regardless of whether the connection was permissible under law or prevailing policy at the time of connection.

Illicit Discharges

Illicit discharges are any discharges to the POV's municipal separate storm sewer system that are not composed entirely of storm water, except discharges pursuant to an NPDES stormwater permit (other than the NPDES permit for discharges from the POV's municipal separate storm sewer system) and discharges resulting from fire fighting activities.

This policy prohibits the following categories of non-stormwater discharges unless the stated conditions are met:

- Discharges from potable water sources, including water line flushing, hyper chlorinated water line flushing, fire hydrant system flushing, and pipeline hydrostatic test water. Planned discharges shall be de-chlorinated to a concentration of 0.1 ppm or less, pH-adjusted if necessary, and volumetrically and velocity controlled to prevent re-suspension of sediments in the MS4.

- Discharges from lawn watering and other irrigation runoff. These discharges shall be minimized through, at a minimum, public education activities and water conservation efforts conducted by the Secondary Permittee and/or the local jurisdiction.
- Dechlorinated swimming pool discharges. The discharges shall be dechlorinated to a concentration of 0.1 ppm or less, pH-adjusted and reoxygenated if necessary, and volumetrically and velocity controlled to prevent resuspension of sediments in the MS4.
- Street and sidewalk wash water, water used to control dust, washdown of equipment, and routine external building wash down that does not use detergents. The POV shall reduce these discharges through, at a minimum, public education activities and/or water conservation efforts conducted by the POV and/or the local jurisdiction. To avoid washing pollutants into the MS4, the POV shall minimize the amount of street wash and dust control water used. At active construction sites, street sweeping shall be performed prior to washing the street.
- Other non-stormwater discharges shall be in compliance with the requirements of a stormwater pollution prevention plan reviewed by the POV which addresses control of such discharges.

The POV's policy does not prohibit the following categories of non-stormwater discharges:

- Diverted stream flows
- Rising ground waters
- Uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20))
- Uncontaminated pumped ground water
- Foundation drains
- Air conditioning condensate
- Irrigation water from agricultural sources that is commingled with urban stormwater
- Springs
- Water from crawl space pumps
- Footing drains
- Flows from riparian habitats and wetlands

Provisions to Require Access

Lease language and access requirements may differ from tenant to tenant and will be addressed on a case by case basis, but at a minimum provides access to the POV to all leased property.

Monitoring & Enforcement Procedures

The POV monitors for illicit connections and illicit discharges in the following manner:

1. By comprehensively mapping the POV's stormwater system, including maintaining a database of all known storm drain outfalls, labeling receiving waters, and delineating areas contributing runoff to each outfall. This map is made available on request to the Department of Ecology and other Permittees or Secondary Permittees.
2. By providing POV Environmental staff with regular training and education on best management practices for preventing and identifying illicit discharges, including spills.
3. By conducting yearly field inspections of at least one-third (on average) of all known outfalls. Inspection reports are recorded and filed in the relevant database or with Ecology. In the event of the discovery of an illicit discharge, the discharge is recorded and analyzed by a POV Environmental Specialist to determine the source, extent, and substance of the discharge. Enforcement procedures, as outline below, are implemented as necessary.
4. By auditing and inspecting tenant leaseholds through the POV environmental audit program and advising tenants of relevant stormwater requirements. Enforcement procedures, as outlined below, are implemented as necessary.

In the event of an illicit discharge the POV shall implement the following enforcement procedures:

1. Contact the responsible party immediately to inform party of the illicit discharge and establish corrective action in cooperation with the POV. Ecology and all relevant entities shall be contacted when required.
2. Upon repeat or continued illicit discharges, the POV shall promptly dispatch a POV environmental employee to conduct an assessment to determine the source of the discharge and risk of reoccurrence. Upon determination of the severity of the discharge and risk of occurrence, the environmental employee, in conjunction with the Environmental Director, may contact the POV Property Manager to report the discharge as a potential violation of the tenant's lease.
3. Upon continued violations after implementation of the above steps, the Environmental Director and Facilities and Economic Development Director shall investigate whether the offending tenant is in breach of their lease. If such a determination is made, the Environmental Director and the Facilities and Economic Development Director shall recommend an appropriate remedy to the Executive Director, up to and including eviction of the tenant in question and cancellation the lease, dependent on the default language of the offending tenant's lease and whether the tenant is in material breach.

Review of Policy

This policy shall be reviewed as deemed appropriate by the Environmental Director.

ADOPTED by the Environmental Director of the Port of Vancouver this 17 day of February, 2010.

PORT OF VANCOUVER, USA


Patty Boyden, Environmental Director