



**ADOPTION OF EXISTING ENVIRONMENTAL DOCUMENT and ADDENDUM
FOR EVERETT SHIP REPAIR VESSEL ADDITION
SEPA No. 2022-09**

ADOPTION OF and ADDENDUM TO (check appropriate box):

☐ DNS

☒ MDNS

☐ EIS

☐ Other

The Port of Everett has prepared this document to adopt previously prepared environmental review documents prepared under the State Environmental Policy Act (SEPA) WAC 197-11-600 and to addend these documents with additional information about the proposal. The additional information does not change the analysis of alternatives or environmental impacts identified in the original documents.

DESCRIPTION OF CURRENT PROPOSAL:

Everett Ship Repair Vessel Addition project includes the addition of a semisubmersible barge to be used as a floating dry dock, known as the Emerald Lifter to existing shipyard operations and replaces an existing 90-ton crawler crane with a 150-ton link belt crane. The new dry dock has lifting capacity of 2,000 tons and a working deck area of 220 ft x 76 ft.

The new dry dock is smaller in capacity and size compared to the existing lifting vessel, known as the Faithful Servant; however, similar maintenance and repair work will be done using the new dry dock including pressure washing; hull repair welding and grinding; painting of hulls and topsides; engine, prop, shaft, and rudder repair and replacement; equipment repair and installation; etc. The Emerald Lifter will be moored alongside the existing staging barge adjacent to the Faithful Servant. Hauls and launches will occur while the dry dock barge is moored near Pier 3.

The new dry dock will allow for the service of multiple vessels simultaneously at the facility. Therefore, vessel capacity at the site is anticipated to increase from approximately 30 vessels to approximately 50 vessels per year.

PROPONENT:

Everett Ship Repair
2730 Federal Avenue
Everett, WA 98201

LEAD AGENCY:

Port of Everett
1205 Craftsman Way, Suite 200

Everett, WA 98201

LOCATION OF CURRENT PROPOSAL:

The Project is in the southwest quarter of Section 19, Township 29 North, Range 5 East, Willamette Meridian. The approximate street address is 2730 Federal Avenue, Everett, Washington. Tax Parcel identification numbers 29051900301600 and 29051900302500 within the Port of Everett Marine Terminal.

TITLE OF DOCUMENTS BEING ADOPTED:

1. Mitigated Determination of Non-Significance (MDNS) for Everett Ship Repair, issued January 3, 2020.
2. SEPA Environmental Checklist prepared by Gavin Higgins dated December 30, 2019.

DESCRIPTION OF DOCUMENTS BEING ADOPTED:

The SEPA Environmental Checklist prepared by Gavin Higgins analyzed environmental impacts of a shipyard use to perform maintenance and repair of boats and ships on the site. The MDNS determined that with conditioned mitigation measures, the project would not have a probable significant adverse impact on the environment.

TITLE OF DOCUMENTS BEING ADDENDED:

1. MDNS for Everett Ship Repair, issued January 3, 2020.
2. SEPA Environmental Checklist prepared by Gavin Higgins dated December 30, 2019.

DESCRIPTION OF DOCUMENTS BEING ADDENDED:

1. MDNS for Seiner Everett Ship Repair is described above.
2. SEPA Environmental Checklist is described above.

AGENCY THAT PREPARED DECISION DOCUMENTS REFERENCED ABOVE:

Port of Everett

DATE ADOPTED DOCUMENTS WERE PREPARED:

Issue dates are provided above.

IF DOCUMENTS BEING ADOPTED or ADDENDED HAVE BEEN CHALLENGED (WAC 197-11-630), PLEASE DESCRIBE:

No challenges were filed against the initial determination.

THESE DOCUMENTS ARE AVAILABLE TO BE READ AT (PLACE/TIME):

These documents and related project information are available at the Port of Everett Administrative Offices at 1205 Craftsman Way, Suite 200, Everett, Washington from 8:00 a.m. to 5:00 p.m., Monday through Friday.

Port of Everett adopts the SEPA Environmental Checklist prepared by Gavin Higgins and MDNS prepared by the Port of Everett. The attached addendum provides additional project information and mitigation measures which will be implemented relative to the current proposal (Everett Ship Repair Vessel Addition). Analysis of the current proposal does not substantially change the analysis of significant impacts in the existing environmental documents. The current proposal remains subject to securing the necessary permits from other agencies with jurisdiction and compliance with those permit conditions.

NAME OF AGENCY ADOPTING THE DOCUMENTS:

Port of Everett

Contact Person: Laura Gurley, Director of Planning **Phone:** (425) 388-0720

Copies of this Notice of Adoption and Addendum are being sent to agencies with jurisdiction in accordance with WAC 197.11.630.

Responsible Official: John Klekotka, P.E.

Signature:  **Date Issued:** 9/15/22

Position/Title: Chief of Engineering & Planning **Phone:** (425) 388-0715

Address: 1205 Craftsman Way, Suite 200, Everett, WA 98201

Appeals: There is no public comment or appeal period for this Port of Everett SEPA addendum.

SEPA Addendum Everett Ship Repair Vessel Addition

As described in the attached Notice of Adoption and Addendum, the SEPA Responsible Official for the Port of Everett is adopting environmental documents prepared by the Port of Everett. This addendum has been prepared in accordance with WAC 197-11-625 to add information to the existing documents related to the Everett Ship Repair Vessel Addition. This information does not substantially change the previous analysis of significant impacts in the existing MDNS. The Everett Ship Repair Vessel Addition project will meet all requirements, restrictions and mitigation measures as dictated through the review processes with the various permit issuing agencies, including Washington Department of Ecology (Ecology), Puget Sound Clean Air Agency (PSCAA), and the City of Everett.

The existing environmental review documents are revised with the information included below and referenced by section numbers in the SEPA Checklist. Additional text is shown in italics and presents additional information to the environmental checklist dated December 30, 2019.

A.7. Future Additions, Expansions, or Further Activity:

A second semisubmersible barge, known as the Emerald Lifter, will be added to operations at Everett Ship Repair, and a 150-ton link belt crane will replace the existing 90-ton crawler crane.

A.8. Environmental Information Prepared:

- *Revised* National Pollutant Discharge Elimination System (NPDES) application prepared for and approved by Ecology
- *Revised* Notice of Construction for Approval to Operate application, prepared for PSCAA
- *Revised* Discharge Authorization application, prepared for the City of Everett

A.10. Government Approvals and Permits

- *Revised* Ecology NPDES permit
- *Revised* PSCAA air permit
- *Revised* City of Everett Discharge Authorization
- *Revised* City of Everett Fire Marshall approval
- *Revised* Port of Everett approval

A.11. Project Description:

For addition to this section after the fourth paragraph:

The Everett Ship Repair Vessel Addition project includes the addition of a semisubmersible barge to be used as a floating dry dock, known as the Emerald Lifter to existing shipyard operations and replaces an existing 90-ton crawler crane with a 150-ton link belt crane. The new dry dock has lifting capacity of 2,000 tons and a working deck area of 220 ft x 76 ft.

The new dry dock is smaller in capacity and size compared to the existing lifting vessel, known as the Faithful Servant; however, similar maintenance and repair work will be done on the new dry

dock including pressure washing; hull repair welding and grinding; painting of hulls and topsides; engine, prop, shaft, and rudder repair and replacement; equipment repair and installation; etc. The Emerald Lifter will be moored alongside the existing staging barge adjacent to the Faithful Servant. Hauls and launches will occur while the dry dock barge is moored near Pier 3. At this location, vessels in need of repair with a draft up to about 14 feet, depending on the shape of the hull, can be hauled or launched.

The new dry dock will allow for the service of multiple vessels simultaneously at the facility. Therefore, vessel capacity at the site is anticipated to increase from approximately 30 vessels to approximately 50 vessels per year.

B.2.a. Emissions:

Revise this section in the second paragraph:

Total estimated abrasive material use will be approximately 270 tons/year *per vessel*.

Revise this section in the first paragraph:

The total estimated use of coating/solvents *for all vessels* is approximately 27,000 gallons/year.

B.3.a.2. Work Over, In or Adjacent to Water:

Revise this section in the first paragraph:

No infrastructure construction would occur over or adjacent to the shoreline. Ship repair work will be performed on the Faithful Servant, *the Emerald Lifter*, and pier-side along the barge. Pier 3 will be used to provide access to the Faithful Servant and for loading/unloading. *Access for loading/unloading for the Emerald Lifter will be from the existing gangway and barge.*

B.3.a.4. Surface Water Withdrawals or Diversions:

Revise this section in the first paragraph:

No. However, submerging the Faithful Servant *and/or Emerald Lifter* will result in temporary movement of surface water within a small portion of Port Gardner Bay, similar to the displacement caused by motion of any larger ship.

B.5.d. Measures to Preserve or Enhance Wildlife:

Revise this section in the first paragraph:

Screens and strainer baskets are installed on the Faithful Servant *and the Emerald Lifter* to prevent intake of marine debris and marine species with ballast water.

B.6.a. Energy Needs:

Revise this section in the second paragraph:

The Faithful Servant and the Emerald Lifter are connected to shore electrical power by a portable power cord, connected to the existing electrical service.

B.8.a. Current Use of the Site:

Revise this section in the first paragraph:

The surrounding area zoning was recently changed from M-2 – Heavy Manufacturing, to HI Heavy Industrial, and the site and adjacent sites are located within the Port of Everett.

B.8.c. Structures on the Site:

Add to this section after the second paragraph:

The Emerald Lifter is a semisubmersible barge with steel hull and superstructure, with an overall length of 220 feet and width of 76 feet.

B.8.e. Zoning:

Revise this section in the first paragraph:

The current zoning classification of the site was recently changed from Heavy Manufacturing, M-2 to HI Heavy Industrial.

B.8.f. Comprehensive Plan Designation:

Revise this section in the first paragraph:

The current Comprehensive Plan designation was recently changed from 5.1 Heavy Industrial to Industrial.

B.8.i. Resident or Employment Numbers:

Revise this section in the first paragraph:

No one resides on the site. Employment numbers on site varies, but total employment is estimated at 125 at full capacity.

B.10.a. Height of Structures, Building Materials:

Replace the third paragraph in this section with the following:

The Emerald Lifter is approximately 43 feet above the waterline at light draft condition. In addition, two cranes will be present on site: a 75-ton rough terrain crane, and a 150-ton link belt crane will be used for operations on site. The crane has capacity to reach upwards of 150 feet with the boom at maximum extension. Maximum extension height is typically not necessary for most maintenance, repair, and service work on site, so this height is not regularly anticipated. If necessary, the boom will only be at maximum height temporarily for a particular lift. It would not be left at that height after completion of the lift.

B.16.b. Proposed Utilities:

Revise this section in the second paragraph:

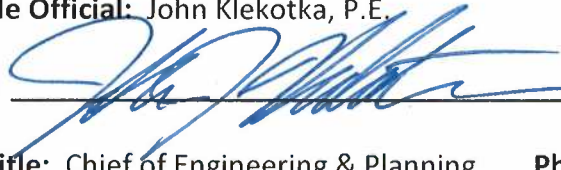
The Faithful Servant *and the Emerald Lifter* will be connected to shore electrical power by a portable power cord connected to existing electrical service. A temporary conveyance, consisting of a sump pump and flexible hose, will be used to convey wash water from the Faithful Servant *and the Emerald Lifter* to an existing sewer lift station at the southeast corner of the site near the Management Office.

Additional Documents:

1. Appendix A includes the site layout for the Everett Ship Repair Vessel Addition project.
2. Appendix B includes BMPs for the Everett Ship Repair Vessel Addition project. No changes or additions to the existing BMP's that remain in effect.

Responsible Official: John Klekotka, P.E.

Signature: _____



Date Issued: _____

9/15/22

Position/Title: Chief of Engineering & Planning

Phone: (425) 388-0715

Address: 1205 Craftsman Way, Suite 200, Everett, WA 98201

Appeals: There is no public comment or appeal period for this Port of Everett SEPA addendum.

Appendix A:
Everett Ship Repair Site Layout

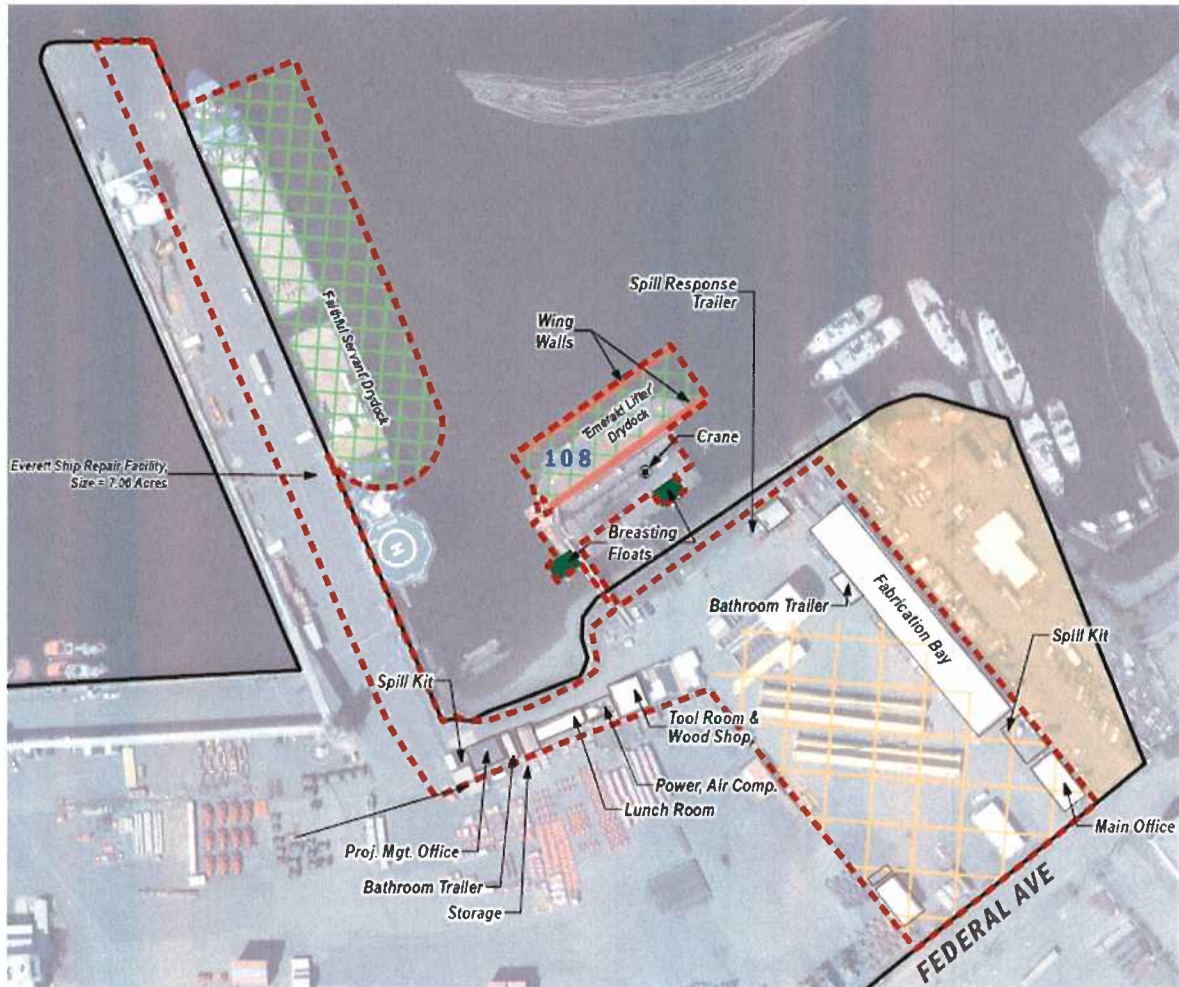


Figure 2. Everett Ship Repair Site Layout

Appendix B:
Everett Ship Repair
Best Management Practices

Everett Ship Repair

Best Management Practices (BMPs) DOE Permit #WA XXXXXX-X

**BEST MANAGEMENT
PRACTICES (BMPs)**

**INDUSTRIAL
WASTEWATER
FACILITY**

NPDES Permit No. WA-XXXXXX-X

**Everett Ship Repair
2730 Federal Avenue
Everett, WA 98201**

October 2019

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BMP 1: Prohibited Smoking Areas

City of Everett Fire Department

Tobacco use is allowed only in designated areas. Tobacco use is not allowed on vessels, vehicles or in buildings. Smoking is not allowed within 50 feet of flammable materials, the Hazardous Material Storage Area or fueling operations.

BMP 2: Yard Clean Up

Storm Water Pollution Prevention Plan

The Yard is to be cleaned on a regular basis to minimize loss of accumulated debris and sand blasting material to storm drains and adjacent waters. Each worker, including subcontractors, is responsible for the cleanliness of his/her work area, whether it be aboard a vessel, in a shop or the emergent work center. Accumulated trash and debris must be removed daily to prevent storm drains from becoming clogged.

Cleanup methods can range from hand pick up to use of heavy equipment such as sweepers, loaders and vacuum trucks. Wastes should be disposed of into the appropriate waste stream. Do not hose down areas and allow the runoff to enter into storm drains. Grit must be swept up as soon as it is observed.

Yard mobile equipment shall be regularly washed at the pressure washing station to remove any blast grit that may have adhered to it.

BMP 3: Designated Paint Mixing Areas

Paints and solvents shall not be mixed on floats.

Paints and solvents must be mixed in designated work areas away from the water and storm drains. Those work areas must be bermed, curbed or over drop pans. Inside of a building or shed is preferred.

Paint and solvent spills shall be treated as oil spills and shall be prevented from reaching storm drains and subsequent discharge into the surrounding body of water.

BMP 4: Liquid Containment

40 CFR, Part 263

Containers storing dangerous wastes or other liquids such as fuels, paints and solvents shall be placed inside a building unless impractical due to site constraints. If placed outside, temporary containment shall be provided. In either instance, place tight fitting lids on all containers.

For ESR the most practical forms of portable containment are movable drip pans of sufficient size or portable metal storage sheds (shipping containers.)

Storage of reactive, ignitable or flammable liquids must comply with the local fire code. The following BMPs are to compliment, not conflict with fire codes:

- 1) Containers shall be located in a protected area, away from drains.
- 2) The areas shall have durable surfaces, free of cracks and gaps and sufficiently impervious to contain leaks and spills or be over a drip pan large enough to hold the contents of the container.
- 3) If liquid waste, the designated area shall be surrounded by a curb, dike or drip pan to provide sufficient volume to contain 10% of the volume of all the containers or 110% of the volume of the largest container, whichever is greater.
- 4) The designated area shall be covered.
- 5) The piers and dry docks are not designated hazardous chemical storage areas. Therefore, hazardous chemicals awaiting movement onto the vessel may only be staged on the piers and drydocks for a maximum of 24 hours.
- 6) Containers of oil and grease may be transported aboard the vessel on wooden pallets. Once the liquids are being transferred to their systems, measures must be taken to prevent a spill. This shall be done by placing a drip pan beneath the pallet or surrounding the pallet with a curb or dike. 7)

Drip pans used for temporary portable containment need not have drains. 8)
When working on the piers with hazardous or non-hazardous liquids, containment must be set up to prevent the liquids from draining into the bay, via the drain holes on each pier. Plugs may be inserted into the drain holes, if necessary, but cannot be done as a substitute for utilizing containment.

BMP 5: Coatings and Solvents

40 CFR, Part 63

Northwest Clean Air Agency

All coatings and solvents used at Everett Ship Repair must be compliant (within the permissible VOC limits). All these materials are reported quarterly in monthly spreadsheets to prove compliance with annual VOC and HAPs limits.

BMP 6: Storage Tanks

Above ground storage tanks shall incorporate protection to prevent contamination of surface water and groundwater.

Permanent Storage tanks are to be surrounded by a dike system. The dike shall be of sufficient height to provide a volume within the dike area equal to 10% of the total tank storage or 110% of the largest tank, whichever is greater.

BMP 7: Drip Pans

The purpose of the drip pans is to catch accidental spills or leaks. Combustible and hazardous Liquids (Oil, antifreeze, paints and solvents) must be prevented from contaminating surface water and groundwater. Drip pans are used to transport these materials within the yard, from pier to and from vessels. They are also used to prevent spills by providing a containment for paint mixing.

Drip pans shall be placed at locations where spillage may occur such as hose connections, hose reels and filler nozzles.

BMP 8: Spill Clean Up

Since spill cleanup must begin immediately, an oil spill kit shall be staged in the immediate area for all activities that involve transfer of oil, fuel, antifreeze or float coat. In addition, they are located in fixed locations throughout the yard. Oil booms and skiffs are available for immediate usage.

In the event a spill occurs, you should notify the Spill Response Coordinator and

- 1) Stop the leak at the source**
- 2) Isolate the spill**
- 3) Cover spill with absorbent material such as absorbent pads**

- 4) Keep area well ventilated**
- 5) Deploy oil containment booms if there is a possibility the spill may reach the water.**
- 6) Identify the material spilled and notify the National Response Center, the Department of Ecology and the US Coast Guard**

BMP 9: Drains

Liquid waste shall not contaminate any water supply. Do not pour liquid waste down floor drains, sinks, outdoor storm drains or drain holes located on each pier. Do not use drains to extinguish cigarettes. Drains must remain clear of debris so water may flow freely, preventing its accumulation. Grit blast material, welding residue or other debris must be cleaned up immediately, so it does not contaminate the bay.

Hazardous and non-hazardous chemicals shall not be stored near drains.

Hazardous materials are to be accumulated and stored in the Hazardous Waste Storage area. These materials are to be logged in when brought to Haz Waste Storage. Used materials (oils and antifreeze) as well as used absorbent materials and drained oil filters are to be brought to the Used Oil Storage area. These materials are also to be logged.

BMP 10: Ballast Water

Ballast water shall not be discharged directly onto the floor of a drydock and then discharged directly to state surface waters. This action is prohibited unless specific authorization by the Department of Ecology has been granted.

BMP 11: Discharge of Sanitary Wastes and Gray water

This BMP applies to vessels that are pierside or on dry docks.

The direct discharge of gray water (including discharges from any ship's galley or shower while at dockside) to water of the state is prohibited.

Ship sanitary wastes shall not be discharged directly to waters of the state. Owners of vessels under repair shall be notified in writing by the Permittee (ESR Yard Policies) that federal and state regulations prohibit the discharge of sewage and gray water into the waterways. Untreated sanitary wastes from vessels must be discharged to either the sanitary sewer or into holding tanks that are periodically emptied into the sanitary sewer system. The Permittee will

make available at all time a list of contractors providing disposal services and other alternatives available for complying with these regulations, such as holding tanks and pump-out facilities.

Hull fittings should be installed, if not already present, to permit the collection of sanitary or gray water for discharge to sewers or holding tanks. If this is not possible, the use of shipboard waste systems should not be permitted unless all wastes can be contained in holding tanks aboard the ship.

BMP 12: Containment of Vessels for Dust and Overspray Control

To the maximum extent practical, all activities are to be enclosed or covered. All interior drains are to be plugged or directed to accumulation for sampling and/or treatment for approval to discharge to the local water treatment plant.

Any activity that generates pollutants, i.e. sand blasting and painting should be done in enclosed, covered areas.

Dust and overspray shall be prevented from falling into the water to the degree feasible during abrasive blasting and spray painting. Feasible methods include barriers hung on the sides and ends of the Submersible Barge or full enclosures. The full enclosures may be constructed on scaffolding or rope frames. The bottom edge of the tarpaulins and sheeting shall be weighted to prevent gaps being created by the wind. They shall also be free of holes and tears which would allow debris to escape. Painting and dry blasting operations will cease whenever wind conditions would make the enclosure ineffective at containing fugitive emissions.

BMP 13: Fugitive Dust

Fugitive dust includes, but is not limited to, blast grit, paint chips, sawdust, sand and weld debris. Accumulation of fugitive dust must be cleaned up immediately to prevent it from becoming an airborne pollutant.

BMP 14: Leaking Pipes and Hoses

Leaking connections, valves, pipes, hoses and soil chutes carrying either water or wastewater shall be replaced or repaired immediately. Vehicles, including forklifts, man lifts, scissor lifts, trucks and cranes with fluid leaks must be removed from service for repair or protected from leaking onto the pier or yard ground with a “duck pond”.

Clean water running over debris can cause the discharge of pollutants to surface waters. Hoses and pipes should be placed so accidental damage will be minimized and should be inspected periodically for signs of damage or deterioration.

BMP 15: Collection of Pressure Wash Water

Discharge from hose washing, high pressure washing, and ultra-high pressure washing/blasting shall be collected from the Marine Railway and the Drydock and treated prior to discharge. Water from these activities taking place on the Submersible Barge will be collected and analyzed. Based on the analysis, it will be treated or discharged to the local Waste Water Treatment Plant.

BMP 16: Dry Dock Clean Up

This BMP is simply to pick up and clean up floatable or low-density debris such as wood, plastic, insulation and spent sand blast grit that might be washed overboard or float away when the dry dock is submerged. However, it is the responsibility of each worker, working on the dry dock, to maintain a clean work area.

Methods for cleaning can include front end loaders, power sweepers, scrapers or other mechanical devices in accessible areas. Areas that cannot be reached with powered equipment should be cleaned by hand using shovels and brooms. Small powered equipment such as bob cat loaders are effective at cleanup activities.

High density items such as keel blocks may remain in place when between the wing walls of the dry dock.

BMP 17: Hazardous Material Disposition

The use of hazardous chemicals contributes to toxic compounds, heavy metals, oils and greases and abnormal pH levels in storm water runoff which contaminates our local waters.

Do not stockpile hazardous waste or used materials. Instead, move them to the appropriate location: Hazardous Waste Storage (Paint Solids and used Emerald Wash) and Used Oil Storage (Used oil, spent antifreeze, used oil filters, used absorbents) so they can be immediately processed for permanent disposal or recycled.

Do not dispose of empty containers in a trash can or dumpster. They must be disposed of properly. See the ESR Manager for specific direction.

Drums and buckets of materials brought to Hazardous Waste Storage or Used Oil Storage must be labeled with contents, project name, item number, date and initials of the person who delivered the material. Please enter the same information in the logs that are located at each respective area.

Drums of oily rags and other absorbents soaked with hazardous chemicals (grease, oil, solvents, etc.) must remain sealed unless materials are being added to or being removed from the container.

BMP 18: Reducing Volatile Organic Compounds (VOC)

VOCs are gases which are released into the atmosphere from industrial chemicals such as paint, solvents and thinners. VOCs are a cause of global warming and can lead to respiratory illnesses. To reduce the amount of VOCs that are released, paint can lids shall remain tightly sealed unless the paint is being mixed or poured. Open containers shall not be used to store paint contaminated debris and solvent/thinner soaked rags. Containers used for these materials shall remain closed unless contents are being added or removed.

BMP 19: Labeling of Waste

Containers of Dangerous or Hazardous Waste must be identified so the waste can be properly handled, stored and disposed of. Individuals disposing of the waste must be familiar with the safe handling procedures of each material.

All containers of Dangerous or Hazardous Waste must be labeled. At a minimum the label will include the container's contents, date, location from where the waste originated and the name of the individual who containerized the waste.

BMP 20: Waste Disposal oily / solvent rags

Oil and solvent-soaked rags must be stored and disposed of properly to prevent fires.

Oil-soaked rags are a spontaneous combustion hazard because as the oil oxidizes, heat is released. If the heat is not dissipated it can build up and ignite the rags. Special "Fire Resistant Cans" should be used to store oil-soaked rags. These containers allow air to flow around the rags, thus dissipating the heat. The waste cans should not have plastic liners and they should be emptied daily.

Here at the shipyard, this means placing the rags in the Used Oil Storage Area. Wring out excess oil at the drain table and place the oily rags into the 55 gallon open topped drum marked "Absorbent Pads/Rags". The lid on the drum must be secured on the drum after the rags are placed in the drum.

Solvent-soaked rags are not a spontaneous combustion hazard but may be a fire hazard since many solvents are flammable. Solvent-soaked rags should be placed in closed "Fire Resistant Cans" to reduce evaporation. The containers should be emptied daily and the solvent should be allowed to evaporate outside. Then the rags can be disposed of as regular garbage in the dumpster.

The Yard Clean-up person is responsible to see that the containers are emptied daily.

BMP 21: Wheel Wash Stations – Drydock and Submersible Barge

Wet grit will naturally adhere to vehicle tires. If the vehicle is being driven or rigged off the Submersible Barge, the grit will get tracked out to the pier and yard. To prevent this migration of grit into the environment, it must be washed off vehicle tires before the vehicle leaves the area. All vehicle tires shall be water washed while the vehicle is on the deck of the Submersible Barge.

BMP 22: Boot Cleaning Stations – Drydock and Submersible Barge

Similar to wet grit adhering to vehicle tires, wet grit will also be picked up and tracked off the drydock or Submersible Barge. To prevent grit from being carried into the yard on worker's boots, everyone who steps foot onto the drydock or Submersible Barge shall clean their boots in the boot cleaning station.

BMP 23: Transferring used Blast Grit to Used Grit Storage

Spent blasting abrasives shall be stored in the designated containment area. This area shall be segregated from wastewater and runoff channels. This area shall be covered with tarps as necessary to prevent leaking or washing of containments into drains or adjacent water. As spent sand is being transferred from the vessel to the storage areas, care must be exercised to prevent sand from spilling out of the transfer containers. Containers must not be overfilled. Containers must be tarped. Containers must not bounce while on forks and being transferred from the vessel to the storage area.

BMP 24: Documentation requirements for in-water vessel maintenance

These documentation requirements are for any in-water surface preparation operations of one hour or more in duration and any in-water coating or painting operation involving ½ gallon or more of paint or marine coating.

Documentation requirements will consist, at a minimum, of one or more representative photographs of all in-water vessel maintenance BMPs which have been implemented for surface preparation operations and all painting and coating operations. The photographs are to be filed electronically in the EHS folder on the servers, each in a separate folder and identified by project including the date taken. Additionally, an electronic logbook of in-water vessel maintenance activities that meet the requirements of this BMP be kept. A descriptive narrative of the in-water vessel maintenance BMPs must be recorded. These records must be made available to all Ecology Inspectors upon request and must be retained on the servers for at least three (3) years.

BMP 25: Employee, subcontractor and customer education

Customers and subcontractors are provided a copy of “CUSTOMER AND SUBCONTRACTOR RESPONSIBILITIES AND EVERETT SHIP REPAIR POLICY REQUIREMENTS” at the time that a purchase order is signed. This document is returned to the Project Manager with the signed contract. All customers, crews of vessels and subcontractors are given orientations using this document at the start of their jobs in the shipyard. The ESR Project Manager meets with these individuals and groups and retains the signed documentation of the orientation. ESR new hire employees are given a more comprehensive Safety and Environmental orientation at the time of their hire. Weekly Safety Meetings are held in each craft department. A monthly Safety Committee meeting is also held. The committee is made up of representatives of each craft department. The minutes of these meetings are provided to all employees.

BMP 26: Floats used for in-water vessel maintenance

Floats are defined as free-floating, unattached work platforms capable of moving back and forth along the length of the ship around its hull. ESR must:

- 1) At all times, maintain floats at a minimum of 6 inches of freeboard at the floats' lowest point during all phases of maintenance operations.

- 2) **Maintain this minimum 6-inch freeboard requirement with all scaffolding configurations and number of people onboard the float.**
- 3) **Take all necessary precautions while onboard the float to prevent paints, cleaning materials, petroleum products, all other liquids and unsecured materials from entering the water from the float.**
- 4) **Provide any container greater than one gallon holding paint, marine coating, or any other liquid product for painting or surface preparation with secondary containment when used onboard a float.**
- 5) **Provide all roller pans used on a float with secondary spill containment equal to the entire volume of the container plus 10 percent of the volume of that same container.**

BMP 27: Hose, soil chutes and piping maintenance

ESR must:

- 1) **Immediately replace or repair leaking connections, valves, pipes, hoses and soil chutes carrying either water or wastewater.**
- 2) **Tightly connect soil chute and hose connections to vessels and to receiving lines or containers and maintain them as leak free as practical.**
- 3) **Place containment devices such as drip pans under chute and hose connections to prevent accidental releases.**

BMP 28: Paint and coating applications BMPs for in-water vessel maintenance

ESR must not spray-paint or spray-coating applications to a vessel's hull while that vessel is in the water. ESR may conduct the following methods of paint and coating applications to a vessel's hull while in the water provided that all containment, collection and spill prevention BMPs are in place before it makes any application: 1) Application by roller. 2) Application by brush.

Ecology may allow ESR to conduct innovative spray-paint or spray-coating application methods on a vessel's hull while it is in the water provided that ESR demonstrates beforehand to Ecology's satisfaction that such methods do not release generated pollutants into water of the state.

BMP 29: Surface preparation BMPs for in-water vessel maintenance

ESR must not clean any portion of a vessel's hull below the waterline. ESR may conduct the following types of surface preparation activities on a vessel's hull above the waterline at ESR provided that containment and collection BMP

measures effectively prevent dust, dirt, debris or any other pollutants generated from this surface preparation operations from being deposited on or entering into waters of the state.

- 1) Mechanical hand preparation, such as scraping or wire brushing.**
- 2) Conventional mechanical grinding or use of other powered mechanical abrading tools.**

ESR must securely fasten containment devices such as tarpaulins, drapes, shrouding or other protective devices between various portions of the vessel or between the vessel and the drydock, bulkhead or shoreline to collect all such materials. ESR must clean up all collected materials daily to prevent their release into the environment and entry into waters of the state.

Ecology may allow ESR to conduct innovative abrasive blasting systems or ultrahigh water pressure systems for surface preparation on a vessel's hull while it is in the water provided the ESR demonstrates beforehand to Ecology's satisfaction that such methods do not release generated pollutants into waters of the state.

BMP 30: Zinc / Sacrificial Anode handling and storage

Sacrificial anodes (zincs) must not be disposed of into waters of the state. Spent zincs must be stored in such a way that they are covered from the elements by tarps or covered containers. Zincs must be routinely removed from drydocks and moved to covered storage for accumulation and recycling.