

Port of Vancouver

Section S2.B, Non-Stormwater Discharges, page 13 of 88 is ambiguous in our opinion. This section regarding non-stormwater discharges has been updated to require permittees to minimize use of PFAS containing aqueous film-forming foams (AFFFs) during emergency firefighting activities. It states that no later than December 31, 2027, the Permittee shall implement specific protocols for minimizing the resuspension, conveyance, and discharge of PFAS already in the MS4, both during normal operations and during all maintenance. We feel that the language makes opinions about what "protocols" the port implements are subjective. I would hope that Ecology can clarify the intent of the statement.