



July 15, 2024

Lucienne Banning  
Washington Department of Ecology  
Water Quality Program, General Permit Unit  
Delivered electronically via the online comment form web portal

Dear Lucienne Banning,

Thank you for the opportunity to provide comment on the 2025 Industrial Stormwater General Permit (ISGP) reissuance. The Port of Anacortes has been tracking the development of the 2025 permit and appreciated the opportunity to attend listening sessions on the ISGP. We wanted to share our perspective on changes to the draft permit.

The Port of Anacortes is an operating port based in Anacortes with operational areas including a marine terminal, marina, airport, and upland properties that generates \$21 million in annual revenue. The Port's mission includes stewardship of resources and private jobs growth. More than 1,000 jobs are supported by Port operations in the maritime, aviation, commercial, service, and recreational sectors.

The Port of Anacortes recognizes that both ISGP and municipal stormwater permits (MS-4) are effective tools to reduce pollutant loads and provide significant environmental benefits. As such, we support implementation of stormwater permits that are based on science, are implementable, and achievable by permitted entities. The Port of Anacortes maintains an MS-4 and an ISGP for our operations. As a regulated industrial facility, the Anacortes Airport operates under an ISGP.

The Port has concerns about ambiguities and additional responsibilities for permittees like us under the new draft permit. Expanded responsibilities outlined in the draft ISGP can place a burden on smaller organizations without extensive resources. It seems that areas previously not requiring ISGP coverage such as cargo loading areas, staging, lay-downs, and piers and wharfs now require coverage. Expanding permit coverage to include these areas without clarifying the requirements or scope of the permit is challenging to plan for. Expanded permit coverage will be a significant burden to compliance for a small organization such as ours and take time to implement. The proposed changes would also put a financial and operation burden on the Port and possibly discourage existing tenants and businesses from expanding. Additional requirements for permit compliance would need to be, in part, passed on to existing and potential tenants, putting the Port at a competitive disadvantage in promoting private jobs growth and retaining current jobs.

A tangible example of how the ISGP can escalate operational costs is the proposed changes to sampling. In our reading of the permit, we will have to sample quarterly for PFAS at the Anacortes Airport. There is a significant cost associated with sample analysis of PFAS. Using our local analytical laboratory, it will cost \$700 per sample to analyze for PFAS (method 1633), assuming quarterly samples and a first flush sample,

this is \$3500 for PFAS alone. For comparison, we spend \$455 annually for our current sample analysis for copper, zinc, and turbidity. This large increase in cost may be a burden larger operators can happily shoulder, but at a small general aviation airport that runs on narrow margins, this is a non-trivial cost. These costs are for sampling only and do not include staff training or additional costs for sample handling.

We maintain similar concerns about the cost of the future requirements for 6PPD-quinone sampling. Presently, our local lab does not do these analyses and processing samples for 6PPD-quinone will require costly courier services or overnight delivery in addition to laboratory fees. We estimate approximately \$600 per sample for 6PPD-quinone for lab fees alone. These fees stack up quickly when taking the long view on the cost of maintaining stormwater compliance; a more than tenfold inflation in annual sample fees is a significant burden. Additionally, linking 6PPD-Q with industrial facilities when it is widespread in our environment does not seem appropriate. Freeways, roads and locations with heavy traffic and vehicle use are all known sources of tire wear particles and not specific to any single industry, they are related to the role and prevalence of vehicles in the modern world.

We are committed to environmental improvements of our operations. We are also keenly aware of the potential burdens these permit conditions could impose. Thank you for your review of our comments.

Respectfully,



Brenda Treadwell  
Director of Planning, Properties and Environmental  
Port of Anacortes