Port of EVERETT

Implementing the 2025 ISGP Training Requirements: The Port of Everett Approach

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Jake Kirschner

Environmental Project Manager

Agenda

- Introduction to Port of Everett Industrial Sites
- Key 2025 ISGP Training Changes
- Implementation Challenges
- Our Implementation Strategy
- Technology that Supported Implementation
- Lessons Learned

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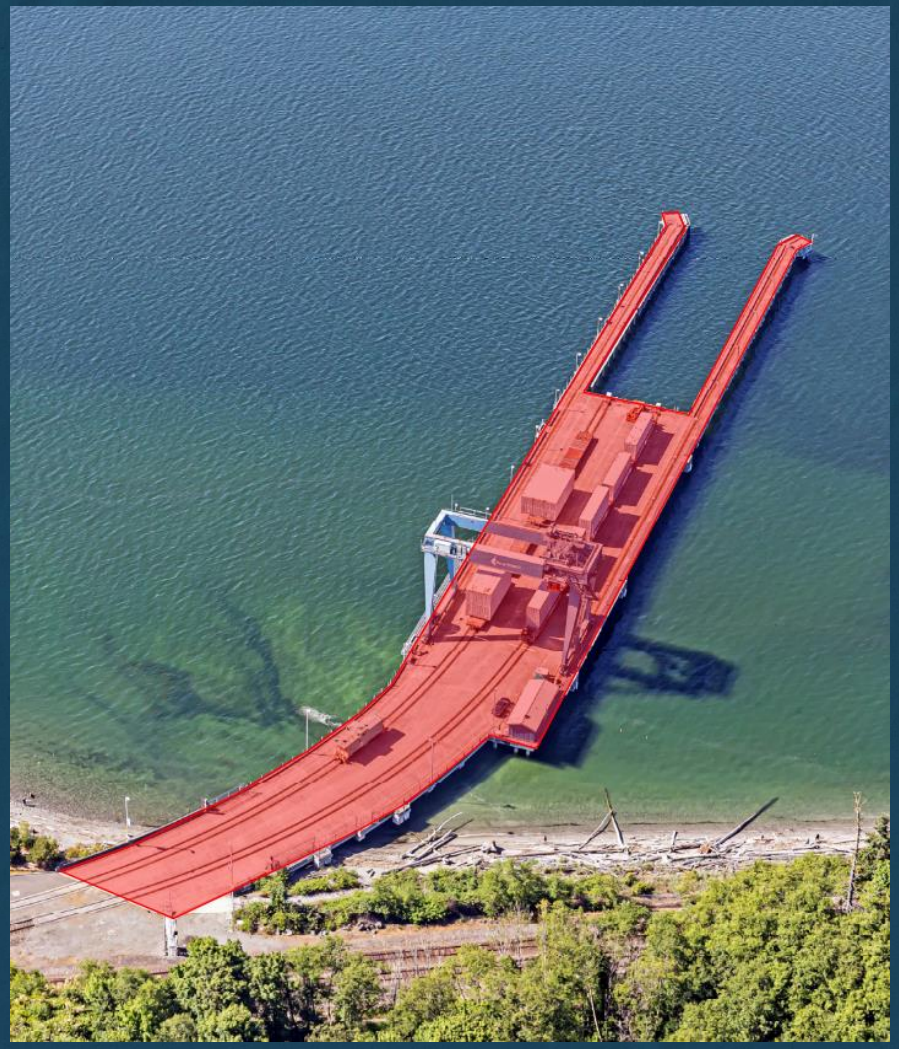
Port of Everett ISGP Regulated Facilities



What Changed in 2025?

Scope of the Audience:
Added requirement to train contractors and vendors whose activities may impact stormwater quality

Training Content:
Minor additions to training content including:

- Identifying who is responsible for maintaining the SWPPP
- Where it is located on-site
- How the trainee is responsible for ensuring BMPs are properly maintained.

Training Frequency:
Training must be administered within:

- Employees and contractors/vendors: within 90 days of hire
- Part-time and seasonal personnel: within 30 days of hire

Why This Was Challenging in Practice

- 100+ acres across three separately permitted ISGP Facilities
- High and variable number of site users day-to-day (Port staff, tenants, contractors, vendors)
- Cross-department coordination of workforce tracking & contracts
  (e.g., new hires, newly executed contracts, etc.)
- Limited visibility into tenant & contractor workforce changes & tenant contractors
- Ambiguity surrounding “potential to impact water quality”
  (e.g., Does a semi-truck visiting our site for the first, and maybe last time have the potential to impact stormwater during their 20-minute visit?)
- Limited internal staffing capacity

Our Implementation Strategy

- **Step 1: Define Who Needs Training**
  - *Who is operating on our sites?*
  - *Do their activities have the potential to impact stormwater quality?*
  - *Are they being supervised on-site by trained staff?*

- **Step 2: Identify Existing Communication Channels**
  - *Who already communicates with these contractor/vendors?*
  - *Are there any existing opportunities to provide this training?*

- **Step 3: Adapt and Develop Training Methods**
  - *Expand reach of annual in-person training beyond staff*
  - *Integrate training into procurement processes and contracts*
  - *Develop simple, easy-to-administer materials for low-risk operators*

- **Step 4: Implementation**
  - *Communicate permit changes and site requirements broadly*
  - *Deliver training through multiple channels*
  - *Document completion and maintain records*

Implementation

- Expand existing training methods to a larger audience
- Integrate training requirements of different NPDES permits into one presentation to provide an annual Water Quality Training.
- Provide commensurate level of training to the contractor/vendors risk while still meeting minimum requirements of the permit.
- Supervise activities to the extent practicable
- Utilize technology

Digital Training Delivery

Port of Everett's Contractor & Vendor ISGP Training

Who requires training?

The Washington State Department of Ecology now requires that contractors and vendors who perform duties that have the potential to impact stormwater quality in areas of industrial activities subject to an Industrial Stormwater General Permit (ISGP) receive training. If you are receiving this training, it is because the Port of Everett has recognized your duties as having an important role in managing stormwater quality at one of our industrial facilities.

What is a SWPPP?

A Stormwater Pollution Prevention Plan (SWPPP) is a site-specific plan required under the ISGP that identifies potential sources of stormwater pollution and outlines best management practices (BMPs) to prevent contaminated stormwater runoff. Its purpose is to protect water quality by ensuring facilities manage stormwater in compliance with the Clean Water Act and state regulations.

The SWPPP contains a facility description, inventory of industrial activities and materials, stormwater BMPs, sampling plan, and SWPPP Site Map. The SWPPP requires monthly inspections and quarterly sampling, with corrective actions based on the results.

Who is responsible for maintaining the SWPPP?

The Port of Everett is responsible for maintaining the SWPPP. This task is carried out by the Stormwater Pollution Prevention Team, which includes the Port's Water Quality Program Manager, the Director of Seaport Operations, and the Marine Terminal Maintenance Foreman.

Where can I find the SWPPP?

The Port operates three industrial marine cargo handling sites, and maintains individual, site-specific SWPPPs for each. The location of the SWPPP at these three facilities is as follows:

- The Marine Terminals
  - The SWPPP is located in the T5 Maintenance Building at 3500 Terminal Ave
- Norton Terminal
  - The SWPPP is located within the Chitosan Enhanced Sand Filtration System Control Unit.
- Mount Baker Terminal
  - The SWPPP is located within the on-site security shack.

How do you make a difference in complying with the SWPPP and preventing contamination of stormwater?

Contractors and vendors often out number port staff at Port-owned facilities and play a critical role in ensuring compliance with the SWPPP, preventing contamination, reporting problems that may impact stormwater, and maintaining BMPs.

Mandatory Good Housekeeping BMPs:

- Vacuum paved surfaces with a vacuum sweeper (or a sweeper with a vacuum attachment) to remove accumulated pollutants. The Port performs this sweeping at least quarterly and relies on adequate access in order to reach all areas of the facility.
- Identify and control all on-site sources of dust to minimize stormwater contamination from the deposition of dust on areas exposed to precipitation.
- Inspect and maintain bag houses monthly to prevent the escape of dust from the system. Immediately remove any accumulated dust at the base of exterior bag houses.
- Keep all dumpsters under cover or fit with a storm-resistant lid that must remain closed when not in use in order to prevent the contamination of stormwater or release of leachate.
- Keep all used and new tires under cover or stored in a storm-resistant shelter

Mandatory Maintenance Requirements:

- Inspect all equipment and vehicles for leaking fluids such as oil, antifreeze, etc. Take leaking equipment and vehicles out of service or prevent leaks from spilling on the ground until repaired.
- Clean up spills and leaks immediately (e.g., using absorbents, vacuuming, etc.) to prevent the discharge of pollutants.

Material Management BMPs:

- Store all hazardous substances, petroleum/oil liquids, and other chemical solid or liquid materials that have potential to contaminate stormwater on an impervious surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed tank volume or 110% of the volume contained in the largest tank, whichever is greater, or use double-walled tanks. Stormwater conveyance systems cannot be used as part of the secondary containment calculation.
- Prevent precipitation from accumulating in containment areas with a roof or equivalent structure or include a plan on how it will manage and dispose of accumulated water if a containment area cover is not practical. If the containment area has a valve, it is to remain closed until verification that no visible oil sheen is present prior to opening the discharge valve.
- A significant amount of debris can accumulate at outside, uncovered loading/unloading areas. Sweep these surfaces frequently to remove loose material that could contaminate stormwater. Sweep areas temporarily covered after removal of the containers, logs, or other material covering the ground.
- Place drip pans, or other appropriate temporary containment device, at locations where leaks or spills may occur such as hose connections, hose reels, and filler nozzles. Always use drip pans when making and breaking connections.

Illicit Discharge Prohibition:

- Water from washing vehicles or equipment, buildings, pavement, steam cleaning and/or pressure washing is considered process wastewater. You must not allow this process wastewater to discharge to ground, comingle with stormwater, or enter storm drains; and must collect in a tank for off-site disposal, or discharge it to a sanitary sewer, with written approval from the local sewage authority.

Spill Response Procedures:

Upon notice or discovery of a spill, or illicit discharge, please notify Port staff as soon as possible.

Spill Notification List	
Name	**Phone Number**
Tim Ryker	425-343-6860
Brian Ducher	425-754-4564
Jacob Kirschner	425-388-0268

Attestation

I, _____, have received and read the above Port of Everett's Contractor & Vendor Training and will adhere to these requirements while conducting my business on Port of Everett.

Signature: Date:

Lessons Learned

- Engage Procurement, HR, and IT early if they are not already involved
- Tailor training to the level of risk while still meeting permit minimum requirements
- Leverage technology to improve efficiency and tracking
- Make the process easy — participation drops when it feels burdensome
- Empower staff who regularly communicate with tenants, contractors, and vendors to distribute required notices

Thank you!
Questions?