

STORMWATER MANAGEMENT PROGRAM PLAN DOCUMENT

PORT OF ANCHORAGE STORM WATER MANAGEMENT PROGRAM *ANCHORAGE, ALASKA*



PREPARED FOR:

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(*Under development*)**

Acronyms and Abbreviations

AAC	Alaska Administrative Code
ABI	Alaska Basic Industries
ADEC	Alaska Department of Environmental Conservation
AFSC	Anchorage Fueling and Service Company (a subsidiary of ASIG)
APDES	Alaska Pollutant Discharge Elimination System
ASIG	Aircraft Service International Group
AST	Aboveground Storage Tank
BMPs	Best Management Practices
CFR	Code of Federal Regulations
CGP	Construction General Permit
CP	Oil Discharge and Prevention Contingency Plan
CWA	Clean Water Act
DMR	Discharge Monitoring Report
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
IDDE	Illicit Discharge Detection and Elimination
JBER	Joint Base Elmendorf-Richardson
LID	Low Impact development
MS4	Municipal Separate Storm Sewer System
MEP	Maximum Extent Practicable
MOA	Municipality of Anchorage
MSGP	Multi-Sector General Permit
NAICS	North American Industry Classification System
NOI	Notice of Intent
NPDES	National Pollutant and Discharge Elimination System
O&M	Operations and Maintenance
OWS	Oil Water Separator
PHF	Pesticides, Herbicides, and Fertilizers

POL	Petroleum, Oil, and Lubricant
Port	Port of Anchorage
QA/QC	Quality Assurance/Quality Control
QAPP	Quality Assurance Project Plan
R&M	R&M Consultants, Inc.
SIC	Standard Industrial Classification
SOP	Standard Operating Procedures
SPCC	Spill Prevention, Control, and Countermeasure
SWMP	Storm Water Management Program
SWPPP	Storm Water Pollution Prevention Plan
SWR	System-Wide Report
TAqH	Total Aqueous Hydrocarbon
Tesoro	Tesoro Alaska Petroleum Company
TOTE	Totem Ocean Trailer Express, Inc.
TTLR	Tank Truck Loading Rack
UST	Underground Storage Tank
VFA	Vehicle Fueling Area
WQS	Water Quality Standards

1. INTRODUCTION

This Storm Water Management Program (SWMP) plan document has been prepared by R&M Consultants, Inc. for the Port of Anchorage (Port) and its Stakeholders. The plan was prepared in accordance with the requirements of the Alaska Pollutant Discharge Elimination System (APDES) Port of Anchorage Municipal Separate Storm Sewer System (MS4) Permit No. AKS052426 – dated 1 August 2015. The Port was originally covered under the Environmental Protection Agency’s (EPA) 1995 National Pollutant and Discharge Elimination System (NPDES) Port of Anchorage Municipal Separate Storm Sewer System Permit. Storm Water permitting was transferred from EPA to the Alaska Department of Environmental Conservation (ADEC) in 2008. In 2015, the Port’s MS4 Permit was reissued under the Alaska Pollutant Discharge Elimination System (APDES). To fulfill the requirements of the new 2015 permit, previous Storm Water Pollution Prevention Plans (SWPPPs) and System-Wide Reports (SWRs) were reorganized into the current SWMP and Summary and Detailed Annual Reports. The purpose of this SWMP is to provide guidance to the Port and its Stakeholders, on a continual basis, regarding Best Management Practices (BMPs) to reduce the potential for pollutants to enter storm water runoff.

The overall goal of the APDES regulations is to improve water quality in lakes, streams, rivers, oceans, and wetlands across Alaska. During periods of rainfall or snowmelt runoff, pollutants are washed from the surfaces of roads, roofs, parking lots, loading docks, storage areas, and other areas exposed to precipitation. In turn, these pollutants may dissolve, become suspended, or float on the surface of the runoff and eventually flow into local receiving waters. The quality of the receiving water is thus influenced by the materials and activities occurring on surfaces exposed to storm water. Water quality is also impacted by pollutants entering storm drain systems directly – from discharges associated with illicit connections or illegal dumping – during dry weather periods.

The main objectives of the APDES regulations are to reduce or eliminate illegal dumping and illicit connections, to reduce – preferably at their sources – the total number of pollutants, and to reduce the overall amount of pollution in storm water. The Port will accomplish these objectives at their facility by developing and continually implementing a SWMP to systematically monitor and address the following:

- Facility site characteristics and drainage systems
- Potential sources of storm water pollution
- Effective BMPs
- Implementation of selected BMPs
- Evaluation of the measures and controls selected to reduce potential pollution
- Annual SWMP modification and update.

1.1 ORGANIZATION

The 2016 SWMP is appended to the 2015 Detailed Annual Report. The Annual Reports provide an overview and assessment of the Port’s implementation of the SWMP for the preceding year.

1.2 CERTIFICATIONS

Appendix A, Part 1.12 of the Port's MS4 permit requires that any application, report, or information submitted to the ADEC in compliance with a permit requirement must be signed and certified in accordance with 18 AAC 83.38 (Appendix A).

1.3 DISCHARGES AUTHORIZED UNDER THIS PERMIT

Subject to the conditions set forth herein and in the permit, the Port is authorized to discharge storm water to waters of the U.S. from all portions of the MS4 owned and operated by the Port. This permit also authorizes the discharge of storm water commingled with flows contributed by process wastewater, non-process wastewater, and storm water associated with industrial activity, provided that the storm water in these flows is only commingled with those categories of allowable non-storm water discharges set forth in Permit Section 1.3. This permit will consider any and all activities conducted by Stakeholders of the Port while within the jurisdictional boundaries of the Port, and which activity leads to a discharge either to or from the MS4, to be the activity of the Port and subject to the conditions of the Port's MS4 permit.

1.4 PORT DESCRIPTION

The Port of Anchorage is located in an industrial portion of Anchorage, Alaska, and currently comprises roughly 220 acres of land. It is bordered by Cook Inlet to the west; Joint Base Elmendorf-Richardson to the north and east; and bulk fuel facilities to the south owned by Tesoro Alaska Petroleum Co. (Tesoro), and Crowley Maritime Corporation. The Port of Anchorage initially began operations in September 1961, with 38,000 tons of marine cargo moving across its single berth during that first year. The Port has since expanded to a five-berth terminal providing facilities for the movement of containerized freight, iron and steel products, wood products, methanol, bulk petroleum, and cement.

The Port is used regularly by two major cargo carriers that bring several ships weekly from the Pacific Northwest. The Port is also used by petroleum tankers and barges that supply jet fuel for Ted Stevens Anchorage International Airport operations and petroleum products bound for western Alaska. Overseas cargo carriers from Japan and Korea use the Port to import and export pipe, drilling mud, construction materials, automobiles, cement, and other freight.

Current Port facilities include two petroleum, oil, and lubricant (POL) transfer terminals, a POL pipeline valve yard, three cargo ship terminals, container cranes, equipment and material staging yards, vehicle transit areas, an administrative building with associated vehicle parking areas, a Security Center, and a maintenance facility. The Port Maintenance Facility consists of a maintenance building/shop, an aboveground storage tank (AST) vehicle fueling area (VFA) including a liquid magnesium chloride storage tank, a used-oil AST, a semi-permanent sand storage tent, and a new marine storage building. The Security Center consists of a security/visitor building and a vehicle screening tent. In 2012, an emergency generator with 150-gallon diesel storage capacity was installed adjacent to the vehicle screening tent. Four underground POL pipelines and a pneumatic cement pipeline are located in utility easements. In addition to the above, the Port is also responsible for maintaining shared areas including transit areas, road right-of-ways, and vacant lease properties.

The Port acquired 48 acres of previously leased land from the U.S. Army in 2011; this area was recently platted and incorporated into Tract J. The land is mostly undeveloped and vegetated, with the exception of a rail spur, the Port's Security Center, and associated access roads (both paved and unpaved). For the undeveloped areas, storm water flows overland and downhill to receiving drainage ditches located along Terminal Road. In the Security Center area, storm water collected from the paved surfaces either sheet flows into drainage ditches or passes through a small network of storm drains that discharge to the drainage ditches.

The demand for Port services has grown steadily in recent years, and this growth is expected to continue into the near future. To keep pace with future trends in the shipping industry and to better serve its existing clients, the Port is preparing to accommodate larger ships with deeper drafts and wider beams. To address the needs of Alaska's smaller coastal communities, the Port also is developing new barge berths and transshipment areas to improve the flow of goods to rural Alaska. The Port of Anchorage is currently planning a modernization project to address the above needs. Actual construction began in 2006 and was halted in 2012 pending additional design and scope changes. The South Backlands and North Extension Area have been stabilized. A notice of termination for coverage under the Alaska Construction General Permit (CGP) has been submitted, and until construction resumes, storm water discharges from these areas are included in the existing Port MS4 permit and the 2016 SWMP.

1.5 DESCRIPTION OF THE STAKEHOLDER FACILITIES

A 220-acre industrial park adjoins the cargo docks of the Port to the east. Approximately 81 acres of the industrial park are under long-term lease to various Port Stakeholders. The majority of the Port's acreage is presently occupied by the two major cargo carriers, Matson and Totem Ocean Trailer Express (TOTE). Three other Stakeholders include Tesoro, Anchorage Fueling and Service Company (AFSC), and Delta Western, Inc. all of which operate bulk fuel storage facilities. The last Stakeholder is Alaska Basic Industries (ABI) which operates a storage and transfer facility for cement. As a neighbor to JBER, the Port provides support services related to military deployment and staging areas for military equipment and cargo. The Port industrial park also has approximately 31 acres available for the temporary staging and storage of marine cargo in transit.

1.5.1 AFSC

This bulk fuel storage facility is owned by AFSC and operated by Aircraft Service International Group (ASIG). AFSC's facility includes a control building, a parking area, an emergency generator connex with a 300-gallon fuel storage tank, a tank truck loading rack (TTLR), a pump station, a bulk fuel tank farm with nine ASTs within a secondary containment area, and an undeveloped wetlands area. Additionally, AFSC operates an underground pipeline system for transporting fuel from the docks to the tank farm, and from the tank farm to Ted Stevens Anchorage International Airport. AFSC's main purpose is to store and transport jet fuel for use at the airport.

1.5.2 TESORO

Tesoro's bulk fuel storage facility includes an administrative/operations building, a parking area, an operations area containing a TTLR that drains to a 12,000-gallon underground storage tank (UST), a valve line-up box, a warehouse facility, a bulk fuel tank farm with 19 ASTs within a secondary containment berm, and an underground pipeline system for transporting fuel from the

docks to the tank farm. Tesoro's main purpose is to store and supply a variety of petroleum products to western Alaska.

1.5.3 MATSON (FORMERLY HORIZON LINES)

Horizon was acquired by Matson in the summer of 2015. Matson's facilities include an administrative/warehouse building, equipment and material staging yards, cargo and vehicle transit areas, container cranes on the docks, two maintenance buildings (one of which contains a vehicle wash bay), a VFA, and vehicle parking areas. Matson facilities also include a portable, inflatable hazardous substance containment unit that can be deployed anywhere on the yard. Matson is one of two major users of the Port's cargo ship terminals. They provide marine shipping services between Anchorage and the Pacific Northwest, and occasionally to other overseas locations.

1.5.4 TOTE

TOTE's facilities include an administrative building, a vehicle inspection facility with vehicle wash bays, an operations center (located in the vehicle maintenance building), equipment and material staging yards, a VFA, cargo and vehicle transit areas, a vehicle maintenance building with a vehicle wash bay, inbound and outbound hazardous cargo container areas, and parking areas. TOTE is one of two major users of the Port's cargo ship terminals. They provide marine shipping services between Anchorage and the Pacific Northwest.

1.5.5 DELTA WESTERN

Delta Western's current facilities include one 50,000-barrel methanol tank with a vapor combustion unit, control building, a dedicated methanol pipe system and marine manifold to transfer methanol from cargo ships through the Port valve yard to the methanol tank, and a truck loading rack and pump to load methanol into transporters (tank trucks). Delta Western's main purpose is to store and distribute methanol. As market demands, Delta Western has plans to construct up to five additional tanks for fuel storage.

1.5.6 ALASKA BASIC INDUSTRIES (ABI)

ABI is leasing a portion of the South Backlands area to construct a cement storage and transfer facility. As of 31 December 2015, the facilities are still under construction. Until construction activities are complete, stormwater discharges are authorized under the APDES CGP (AKR10FA69). The cement storage facility has been designed to contain 40,000 tons of cement product once completed.

1.6 STORM WATER DRAINAGE SYSTEM

The Port's storm water system is permitted and regulated by the APDES program as a Phase I MS4. It consists of seven outfalls that discharge into the Cook Inlet tidelands: Outfalls 001, 002, 003, 004, 005, 006, and 007. The system includes numerous structural controls, such as solid piping, perforated piping, containment berms, drainage valves, catch basins, a sedimentation basin, manholes, sumps, grating, drainage ditches, and curbing. Outfalls 001, 002, and 003 have been

monitored and included in the Port's MS4 since permit issuance. Outfall 006 collects and discharges storm water from a newly constructed area of the Port referred to as the South Backlands; construction in this area of the Port was completed in 2011. Outfall 007 drains the North Extension Area which is part of the Port Modernization Project. This area is covered under the Port's existing MS4 permit until construction resumes.

There are currently two other outfalls that discharge into Cook Inlet located at the Port, the Gaylor Gulch outfall (Outfall 005) and the POL Valve Yard outfall (Outfall 004). Gaylor Gulch drains storm water from Joint Base Elmendorf-Richardson (JBER) to the east; JBER is covered under a separate APDES MS4 permit. Storm water traveling through Gaylor Gulch discharges into the Gaylor Gulch Weir at the foot of Cherry Hill. The weir is drained by a buried storm drain line that trends north along Terminal Road before turning sharply to the west and traversing Port property to empty into Cook Inlet near Trestle No. 1-A. Both the weir and the buried line belong to the Port. In the Port MS4's current configuration, several storm drain catch basins on Port property discharge runoff into this line. Although this commingling of storm water does occur, the quality and quantity of storm water in the line remain the general responsibility of JBER. It is roughly estimated that greater than 90% of the flow in this line originates on JBER. However, the Port will begin monitoring the discharge at this outfall to ensure that stormwater is not being affected from upstream sources.

The POL Valve Yard has its own storm drain outfall (Outfall 004), which is not interconnected to the Port's storm drain system. The valve yard is also equipped with a manual discharge valve and oil/water separator.

2. GENERAL REQUIREMENTS

The Port must revise as necessary, implement, and enforce this SWMP which is designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP) to protect the water quality of receiving waters. The SWMP must include BMPs, control techniques, system design, engineering methods, and other provisions as appropriate to control and minimize the discharge of pollutants from the MS4.

This SWMP covers the effective term of the current MS4 Permit (1 August 2015 through 1 August 2020) and will be updated as necessary or as required by ADEC, to ensure compliance with Section 402(p)(3)(B) of the CWA, 33 U.S.C. §1342(p)(3)(B). Modifications to the SWMP will be made in accordance with Part 2.4 of the MS4 permit. All components and requirements of the SWMP are enforceable conditions of the permit. The Port will conduct an annual review of the SWMP, its implementation effectiveness, and submit an updated version with the Annual Reports to ADEC annually by 15 February.

The Port must submit any plan revisions or documents that require review and approval by ADEC to the address listed in Part 4.5 of this document and in accordance with Parts 2.4 and 4.0 of the permit. Within 60 days of receipt of such plans or documents, ADEC shall have the right to disapprove or require modifications to the plans or documents for approval. The SWMP shall clearly identify the roles and responsibilities of the Port as well as activities required of the Stakeholders by the Port.

2.1 APPLICATION FOR PERMIT REISSUANCE

The Port shall reapply for permit reissuance on or before February 2, 2020.

2.2 NOTIFICATION OF NONCOMPLIANCE

Incidences of non-compliance that may endanger human health or the environment must be orally reported to ADEC within 24 hours from the time the Port and/or Stakeholder becomes aware of the circumstances of noncompliance. Within 5 days after the Port and/or Stakeholder becomes aware of the circumstances, ADEC will be given written notification of the noncompliance incident. Details of the required documentation are outlined in Appendix A, 3.4 of the MS4 Permit.

2.3 ANNUAL REPORTING

Results and details of annual inspections, the number and type of official enforcement actions, and the type of public education activities and outcomes will be documented in the Detailed and Summary Annual Reports. Refer to SWMP Section 4.3 for additional information.

2.4 TRANSFER OF OWNERSHIP, OPERATIONAL AUTHORITY, OR RESPONSIBILITY FOR SWMP IMPLEMENTATION

Transfer of ownership, operational authority, or responsibility for SWMP implementation requires submittal of all corrected documentation to ADEC for a 60-day review before implementation of transfer.

The Port must implement the SWMP in all new areas added or transferred to the Port’s MS4 (or for which the Port becomes responsible for implementation of storm water quality controls) as expeditiously as practicable, but within one year from the date upon which the new areas were added. Such additions and schedules for implementation must be documented in the next Detailed Annual Report following the transfer.

2.5 STAKEHOLDERS AND MSGP

ADEC has assumed responsibility for the storm water program effective 31 October 2009 as part of the phased transition of the NPDES permitting program from the EPA to the ADEC. In the past, the Port of Anchorage has maintained coverage under the NPDES for stormwater discharges; all of the Port Stakeholders had coverage by extension under the Port’s Individual NPDES Permit. Now that authority for the storm water program has transferred to ADEC, the Port’s MS4 permit was re-issued by ADEC as an Individual APDES Permit. As a result, Stakeholders will no longer be directly covered under the Port’s MS4 permit, and will be responsible for obtaining their own storm water discharge permit coverage under the Multi-Sector General Permit (MSGP).

Table 2.5 - 1 Port of Anchorage Stakeholders

Facility Name	Nature of business or activity	North American Industry Classification System (NAICS)	MSGP Coverage Status
AFSC	Bulk fuel transfer and storage	424710	Covered, NOI filed December 2015
Tesoro	Bulk fuel transfer, storage and blending	424710	Not covered
Matson	Containerized freight handling	483113	Not covered
TOTE	Roll-on/Roll-off containerized freight handling	483113	Not covered
Delta Western	Methanol transfer and storage	493110	Covered, NOI filed December 2015
ABI	Cement transfer and storage	423320	Not covered

2.6 STORM WATER POLLUTION PREVENTION TEAM

Roles and responsibilities of the Stormwater Pollution Prevention Team are summarized in this section. Names and contact information are contained in Appendix B.

Team Leader - The responsibilities of the Port's SWPP Team Leader are outlined below.

- Serve as primary point of contact for all communications concerning SWMP implementation
- Coordinate annual updates and revisions to the SWMP and annual reports
- Serve as a liaison between Port management and individual team members
- Define and communicate to team members the APDES Storm Water Discharge Permit requirements, due dates for implementation, and set clear and reasonable goals for the Port's SWMP.

SWPP Team Members - The responsibilities of individual SWPP Team Members are outlined below:

- Serve as the point of contact for issues concerning storm water discharge compliance and inspections at Port tenant facilities and leased properties
- Coordinate their respective company's response to APDES storm water discharge compliance issues
- Annually help facilitate employee training program with Port-provided or approved materials
- Evaluate any existing environmental or general operations and management plans – including preventive maintenance for their respective Port facility – and incorporate storm water management practices into facility operations to the extent not already addressed by those plans
- Annually review this SWMP and discuss the results of an inspection of their respective Port facility or leased properties
- As part of the annual SWMP review, report whether their facility is in compliance with the SWMP, communicate any deficiencies in the SWPPP as it concerns their operations, and report any changes in the facility or operations and management practices which are relevant to storm water pollution prevention
- As part of the annual SWMP review, provide verbal assurance that an assessment for non-storm water discharges from their leased properties has been performed
- Be designated as responsible for spill prevention, response, and reporting at their respective Port facility.

3. MINIMUM CONTROL MEASURES

3.1 PUBLIC EDUCATION AND OUTREACH

Table 3.1 summarizes the requirements of the MS4 Permit and outlines the corresponding activities at the Port related to Public Education and Outreach.

Table 3.1: Public Education and Outreach

Permit Requirements	Planned and Ongoing Activities
<p>Revise as necessary, implement, and evaluate an ongoing Port education program to educate the permittee’s Stakeholders and users about the impacts of storm water discharges on water bodies.</p>	<p>The Port or its representative will implement an annual storm water pollution prevention education program. All Port and Stakeholders employees and contractors who are involved in activities having the potential to impact storm water quality will be required to participate in the education program. The purpose of the education program will be to promote, publicize, and facilitate the following:</p> <ul style="list-style-type: none"> • Implementation of technologies and techniques to prevent pollution through source reduction and recycling • Reporting of the presence and improper disposal (illicit discharges) of materials into the Port’s storm water drainage system • Proper management and disposal of vehicle fluids, common hazardous wastes and materials, and solid waste • Proper use, application, and disposal of pesticides, herbicides, and fertilizers by commercial and private applicators and distributors conducting such business within the area covered by the Port’s MS4 permit <p>The annual education program will consist of presenting a relevant storm water pollution prevention training video that will provide training on Illicit Discharge Detection and Elimination (IDDE), BMPs and good housekeeping measures that can prevent storm water contamination from occurring. Following presentation of the video, a quiz on the video’s content will be administered, and trainees will sign a training acknowledgment form stating the date training was received. In addition, the training session will include a brief time during which trainees may ask questions and seek clarification on storm water related issues. If the trainer(s) is not able to provide adequate answers, the Port or its representative will be responsible for providing additional information.</p>
<p>The education program must include the steps that the following key audiences – employees, contractors, Stakeholders, and visitors – can take to reduce pollutants in storm water runoff.</p>	<p>Steps that the key audience can take to reduce pollutants in storm water runoff:</p> <ul style="list-style-type: none"> • Properly install BMPs • Attend the trainings • Follow good housekeeping • Use proper spill prevention and response procedures

Table 3.1 (continued)

Permit Requirements	Planned and Ongoing Activities
<p>Primary goal of the education program is to reduce or eliminate behaviors and practices that cause or contribute to adverse storm water impacts.</p> <p>The permittee must develop a prioritized schedule and plan in addition to the items listed in Part 3.1.3 of the Permit to reach the key audiences through the ongoing education efforts.</p>	<p>The education program will cover these items listed in Part 3.1.3 of the Permit:</p> <ul style="list-style-type: none"> • Reporting the presence of illicit discharges or improper disposal of materials into the MS4; • The proper management and disposal of used oil and commonly used hazardous materials; • The proper use, application, and disposal of pesticides, herbicides, and fertilizers by commercial and private applicators and distributors conducting such business within the Port’s jurisdictional area; and • The pollution prevention and good housekeeping practices <p>The education program is a year-round effort consisting of various activities to disseminate information to the key audiences. Port and Stakeholder employees who are involved in activities having the potential to impact storm water quality will be required to participate annually in the public education program described above. At quarterly meetings, educational material will be disseminated to the Storm Water Pollution Prevention Team Members who in turn will distribute the information to their staff.</p> <p>As the Port is a secure facility, unescorted visitors are infrequent and likely will have limited to no contact with storm water. Visitors are typically escorted by the Stakeholder or Port representatives for the entirety of their visit.</p> <p>As needed throughout the year, trainings will be conducted to address violations or incidents involving storm water and pollution prevention.</p>

3.2 PUBLIC INVOLVEMENT AND PARTICIPATION

Table 3.2: Public Involvement and Participation

Permit Requirements	Planned and Ongoing Activities
<p>Make the latest updated version of the SWMP Plan and Annual Report available to the public. The most recent SWMP Plan and Annual Report shall be posted on the Port's website</p>	<p>Each year, the Port will post the latest version of the SWMP Plan and Annual Reports on the Port's website</p>
<p>Within one year of the effective date of this permit, the permittee will develop and implement a storm drain stenciling program with attainment of stenciling 50 percent of the storm drain inlets within two years, and stenciling 100 percent of the storm drain inlets within four years.</p>	<p>As of August 2015, 100 percent of the storm drains at the Port have been stenciled. Storm drains will be remarked as needed.</p>
<p>Storm Water Pollution Prevention Team is to meet at least quarterly to coordinate and accomplish the goals of the SWMP; meeting schedule must be made known to lessees and ADEC through direct mail or e-mail notification, if possible.</p> <p>Document SWPP Team meeting minutes in Annual Report.</p>	<p>The Storm Water Pollution Prevention Team shall meet at least quarterly to coordinate and accomplish the goals of the SWMP. An e-mail notification shall be sent to the Stakeholders and ADEC with the agenda.</p> <p>See Appendix B for the list of Storm water Pollution Prevention Team members</p> <p>The meeting minutes will be made available on the website and documented in the reports.</p>

3.3 ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

“Illicit discharge” means any discharge to the Port’s MS4 that is not composed entirely of storm water. Illicit discharges of liquid or solid waste into any storm drain inlet including, but not limited to, ditches, surface water bodies, floor drains, sinks, catch basins, manholes, sheet flow runoff, or other storm drain inlets, are prohibited and considered illicit discharges. Table 3.3 summarizes the requirements of the MS4 and outlines the corresponding activities at the Port related to Illicit Discharge Detection and Elimination.

Table 3.3: Illicit Discharge Detection and Elimination

Permit Requirements	Planned and Ongoing Activities
<p>Conduct wet and dry weather outfall inspections to identify and investigate any illicit, inappropriate, or undocumented non-storm water discharge to the storm sewer system.</p>	<p>Refer to the Monitoring Program Plan in Section 4 of this SWMP.</p>
<p>Implement a program to detect and eliminate illicit discharges - must incorporate detection, identification of the source, and removal of non-storm water discharges, including illegal dumping into the storm sewer system.</p> <p>The permittee must, as part of this activity, develop a system to track illicit discharges.</p>	<p>The Port and its Stakeholders implement an ongoing, year-round awareness program to encourage employees to report any illicit discharges to their respective SWPPP team member or supervisor. The intent of the awareness program is to encourage employees to be mindful of storm water management practices and discuss storm water related issues during safety or staff meetings. The program is initialized each year with a brief storm water-specific training session conducted by the Port’s representative for each stakeholder; this session is described in SWMP Part 3.o.</p> <p>When an illicit discharge is discovered an Illicit Discharging Tracking Sheet (Appendix C) will be completed and submitted to the Port. Tracking results will be reported with the Annual Reports.</p>
<p>Must effectively prohibit non-storm water discharges into the system through an ordinance or other regulatory mechanism to the extent allowable under federal, state, or local law.</p> <p>Must implement appropriate enforcement procedures and actions, including enforcement escalation procedures for recalcitrant or repeat offenders.</p>	<p>The Municipality of Anchorage ordinance (15.50.020) prohibits non-storm water discharges into the MS4. The Port will follow the Municipality’s enforcement procedures in addition to the Port’s own enforcement regulations.</p> <p>In addition, Stakeholders will be financially responsible for costs incurred by the Port to resolve Stakeholder MS4 incidents; if incidents are repetitive, the Port reserves the right to revoke the existing lease.</p>

Table 3.3 (continued)

Permit Requirements	Planned and Ongoing Activities
<p>Must update the existing comprehensive storm sewer system map - must show jurisdictional boundaries, location of all inlets and outfalls, names and locations of all waters that receive discharges from those outfalls, and locations of all operated facilities, including snow disposal sites.</p>	<p>The figure included in Appendix D is the current map of the Port’s current MS4 jurisdictional boundaries as outlined in the MS4 Permit. An updated comprehensive storm sewer system map is currently under development and will initially be submitted to ADEC for review by 1 August 2016 and included in future SWMPs and Annual Reports.</p>
<p>Describe the controls to limit infiltration of seepage from municipal sanitary sewers to the MS4 where necessary; submit to ADEC as part of the corresponding Annual Report</p>	<p>The controls to limit infiltration of seepage are currently being developed. A description of the controls will be submitted in the corresponding Detailed Annual Report when they are completed and incorporated into future SWMPs as necessary.</p>
<p>Describe the controls, time-line, and resources to mitigate groundwater infiltration from petroleum-contaminated sites to the MS4 where necessary.</p>	<p>Certain sections of the existing storm drain system may be in need of replacement. It has been determined that historical soil and groundwater contamination is infiltrating the storm system particularly along the northern portion of the Tesoro property. This portion of the storm drain system was replaced in the summer of 2015. The storm drain conveyances were lined and Outfall 003 replaced as part of this effort. The Port continues to survey the remaining sections of the storm drain system to identify any additional deficiencies. In a separate effort, Tesoro is actively working with ADEC to further characterize their groundwater contamination that is infiltrating the Port’s storm drain system.</p> <p>As additional sections of the storm drain system with deficiencies are identified, a description of controls, a timeline, and resources to mitigate groundwater infiltration from petroleum-contaminated sites to the MS4 will be submitted with the corresponding Detailed Annual Report.</p>
<p>The Port must investigate any illicit discharge within 15 days of its detection and must take action to eliminate the source of the discharge within 45 days of its detection; raw data and narrative review of screening and mapping shall be included in the following year’s Annual Report from the year the data was collected</p>	<p>Upon identification of an illicit discharge, the Port or its representative will complete an Illicit Discharge Tracking Worksheet (Appendix C) and notify the appropriate individuals of the discharge. Refer to Section 3.5 for enforcement.</p>

3.4 CONSTRUCTION SITE STORM WATER RUNOFF

All construction projects at the Port will adhere to the conditions of applicable local, state, and federal laws which require construction site operators to practice appropriate erosion, sediment, and waste control through authorization under the APDES Construction General Permit (CGP). For the purpose of the CGP “Construction Activities” include, at a minimum, construction involving a total land disturbance of 10,000 square feet or more at a single construction site or as part of a plan of common development. The Port is not required to develop, implement, or require authorization if ADEC issues a waiver in accordance with 40 CFR §122.26(b)(15)(i) (A) or (B) (adopted by reference at 18 AAC 83.010). Table 3-4 summarizes the requirements of the MS4 permit and outlines the corresponding activities at the Port related to Construction Site Storm Water Runoff.

Table 3.4: Construction Site Storm Water Runoff

Permit Requirements	Planned and Ongoing Activities
The Permittee must develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the MS4 from construction activities.	To ensure that storm water quality controls have been addressed prior to the beginning of any construction project the responsible party (construction contractor) will complete the Construction Site Form and submit to the Port for a consistency review against the SWMP (Appendix E) for all ground disturbance projects. If the project disturbs 10,000 square feet or more, the responsible party for each project will also be required to coordinate with the MOA to assure compliance with the requirements outlined in AG-21. The Contractor is responsible filing a Notice of Intent (NOI) in accordance with ADEC regulations.
The permittee must adopt or develop and implement procedures for site inspection and enforcement of control measures. The permittee shall inspect all construction sites and maintain documentation of the inspection findings in their jurisdictions for appropriate erosion/sediment/waste control at least once per year.	The Port will facilitate inspections by ADEC as necessary to document regulatory compliance. The Contractor for each project will conduct SWPPP regular inspections and will submit these SWPPP inspection records to the Port within seven calendar days of the inspection. The Port may conduct announced and unannounced construction site inspections at any time during the project.
The Procedures must include provisions for receipt and consideration of information submitted by the public.	NOIs submitted for authorization under the CGP occurring on Port property will be posted to the website providing the public with the opportunity to review and comment.
Implement a program that provides appropriate education and training for construction site operators.	Part of the ongoing educational program; Refer to SWMP Part 3.0.

Table 3.4 (continued)

Permit Requirements	Planned and Ongoing Activities
<i>The permittee must adopt or publish and distribute requirements for construction site operators to implement appropriate erosion and sediment control BMPs and to control waste such as discarded building material, concrete truck washout, chemicals, litter and sanitary waste at the construction site that may cause adverse impacts to water quality.</i>	<i>Under development</i>

3.5 ENFORCEMENT

The stakeholder is responsible for the clean-up and resolution of an MS4 incident (illicit discharge, etc.) and associated costs to remedy the issue. If incidents become repetitive and/or stakeholder is recalcitrant, the Port reserves the right to revoke or modify the stakeholder’s lease as deemed appropriate. Below is a table that presents the warning system and repercussions for each time an incident occurs over the course of a construction project.

Table 3.5: Illicit Discharge Warning System and Repercussions

Number of Times the Incident Occurs	Repercussion
First Incident (Blue Flag)	Verbal Warning – Written documentation/Notification to ADEC as necessary.
Second Incident (Yellow Flag)	Written Warning – Documentation and notification to ADEC as necessary.
Third Incident (Orange Flag)	Training – The Port, at its discretion, may require storm water training session specific to the incident at the Stakeholder’s/Contractor’s expense.
Fourth Incident and onward (Red Flag)	The Port, at its discretion, may choose to fine the Stakeholder/Contractor for the incident and reserves the right to revoke the stakeholder’s lease

3.6 POST-CONSTRUCTION SITE STORM WATER RUNOFF

Table 3.6 summarizes the requirements of the MS4 and outlines the corresponding activities at the Port related to Post-Construction Site Storm Water Runoff.

Table 3.6: Post Construction Site Storm Water Runoff

Permit Requirements	Planned and ongoing activities
<p>The permittee must develop a strategy that outlines the methods of evaluating Green Infrastructure/LID pilot projects. The Program must ensure that controls are in place that would prevent or minimize water quality impacts and comply with the evaluating Green Infrastructure/LID pilot projects strategy.</p>	<p style="text-align: center;"><i>Under Development</i></p>
<p>By August 2018, the permittee must adopt or develop, implement, and enforce a program to address post-construction storm water runoff from new development and redevelopment projects that disturb greater than or equal to 10,000 sq. ft. that discharge into the MS4.</p>	<p>To ensure that post-construction storm water runoff controls from new development and redevelopment have been addressed for projects that disturb greater than or equal to 10,000 sq. ft., the responsible party for each construction project is required by applicable state and federal storm water regulations to prepare a post-construction design for permanent storm water controls. Designs for permanent storm water controls must receive a storm water design plan review and letter of non-objection from ADEC prior to construction. Prior to submitting the designs to ADEC, the responsible party is to submit the designs to the Port for review. The post-construction storm water controls design should incorporate plans and specifications, including explanations of the proposed storm water quality control measures, BMPs, and Standard Operating Procedures (SOPs) that will be used to prevent the discharge of pollutants to the MS4 upon completion of project construction.</p> <p>The responsible party must also complete the Port’s Post-Construction Site Form (Appendix F) and submit it, along with a drainage plan to the Port.</p> <p>The responsible party will comply with the submitted drainage plan or the Port holds the right to revoke the Stakeholder’s lease. If the responsible party should divert from the plan and it results in an incident, the responsible party will be responsible for any costs (time, effort, and materials) incurred by the Port to resolve the incident.</p>

Table 3.6 (continued)

Permit Requirements	Planned and ongoing activities
<p>The permittee must carry out a planning process, for example, a master plan, to develop, implement and enforce controls to reduce post-construction runoff from new development and redevelopment projects.</p>	<p>The current Port Master Plan was completed in 1999. It requires developing, implementing, and enforcing storm water quality controls during all future planning sessions. Consideration will be given to the impacts that new and re-development projects may have on storm water quality.</p>

3.7 POLLUTION PREVENTION AND GOOD HOUSEKEEPING

Table 3.7 summarizes the requirements of the MS4 and outlines the corresponding activities at the Port related to Pollution Prevention and Good Housekeeping.

Table 3.7: Pollution Prevention and Good Housekeeping

Permit Requirements	Planned and Ongoing Activities
<p>Must conduct storm water pollution prevention inspections, including: bulk fuel facilities and their perimeters, and catch basins.</p>	<p>The Port shall conduct storm water pollution prevention inspections for its facilities. Stakeholders shall conduct inspections for facilities that are their responsibilities and maintain records of inspections.</p>
<p>Provide an area for the washing of Port owned or operated vehicles that will not result in a discharge to waters of the U.S.</p>	<p>The Port provides an area for washing of Port owned or operated vehicles. This area is in Port jurisdictional boundaries (Section 3.8). The Port does not provide a vehicle washing area to Port Stakeholders. If applicable, individual Port Stakeholders have and maintain their own vehicle washing area and are responsible for proper operation and maintenance of this area. The Port Stakeholders ensure proper management practices are adhered to at all times in the respective Stakeholder’s vehicle washing area(s).</p>
<p>Implement a program to identify, monitor, and control pollutants in storm water discharges to the MS4 from: hazardous waste treatment, storage, and disposal facilities that are subject to Emergency Planning and Community Right-to-Know Act (EPCRA) Title III, Section 313; bulk storage facilities; and any other industrial or commercial discharges the Port determines are contributing a substantial pollutant loading to the MS4. The program shall include priorities and procedures for inspections and establishing and implementing control measures for such discharges. The program shall also include an inventory listing the facility name, address, nature of business or activity, and Standard Industrial Classification (SIC) code(s) that best reflect the facilities produce or service.</p>	<p>Two bulk fuel storage facilities at the Port – AFSC and Tesoro – have the potential to contribute pollutant loading to the MS4. Industrial dischargers are required to have a program that includes the following:</p> <ul style="list-style-type: none"> • Priorities and procedures for inspections and establishing and implementing control measures for their storm water discharges into the MS4 • A self-monitoring program, including the collection of quantitative data on the constituents listed in Permit Part 4.1.2.3.2. <p>Maintenance and inspection activities for facilities and equipment that have the potential to affect storm water quality will be recorded and kept on file at each respective facility. Records will include the name of the person conducting the activity, the date, time, exact place, and description of the activities conducted, as well as findings and follow-up. Materials tracking and inventory practices will be continually reviewed and improved so that wastes resulting from overstocking and the disposal of outdated materials can be reduced and/or eliminated (Appendix G).</p>

Table 3.7 (continued)

Permit Requirements	Planned and Ongoing Activities
Operate and maintain public streets, roads, parking areas, and cargo storage/staging areas under its jurisdiction in a manner to reduce, to the MEP, discharge of pollutants (including those related to deicing or sanding activities)	In addition, each facility will continue to implement litter control procedures to keep their areas free of debris that might otherwise enter the storm drain. This effort is particularly important during spring breakup, when the accumulated debris of the winter begins melting out of the snow and ice (Section 3.8).
Shall implement controls to reduce, to the MEP, the discharge of pollutants related to application of pesticides, herbicides, and fertilizers applied by the permittee's employees, contractors, or lessees to public right of way, and all Port lands and facilities	The use and application of pesticides, herbicides, and fertilizers (PHFs) that are not in accordance with Pesticide Control Regulations 18 Alaska Administrative Code (AAC) 90 is prohibited. All other use of PHFs shall be minimized to the maximum extent practicable.
By August 2018 and annually thereafter, the Port must complete a study of the effectiveness of current street sweeping operations and storm drain cleaning operations with potential for storm water impacts	Currently street sweeping operations are conducted on an as needed basis. The port is only 220 acres and minimal street sweeping is needed. The Port will begin an effort to track and measure the effectiveness of its street sweeping operations and storm drain cleaning operations in the future (Appendix I).

3.8 OPERATION AND MAINTENANCE PROGRAM

This following Operation and Maintenance (O&M) Program refers to the Port-maintained facilities; each Stakeholder will be required to prepare and implement an operation and maintenance program, schedule, and maintain records. Copies of individual O&M programs and records must be made available upon request.

The Permit requires the program to address Port activities with the potential to negatively impact stormwater quality, including: the use of sand and road deicers; fleet maintenance and vehicle washing operations; street sweeping, cleaning and maintenance; grounds and open space maintenance operations; building maintenance; solid waste transfer activities; storm water system maintenance; snow disposal site operation and maintenance; snow removal practices; materials storage; scrap metal bins, hazardous materials storage; industrial-like facilities; used oil recycling; spill control and prevention measures for refueling facilities; and new construction and land disturbances.

Table 3.8: Operation and Maintenance Activity

Activity	Source Measure(s)
Use of Sand and Road Deicer	Road sanding will be done on an as needed basis during the winter. During spring breakup, sand will be swept. No deicer is used at the Port.
Street Sweeping, Cleaning, and Maintenance	Facilities with paved areas will continue to implement street sweeping procedures to minimize the accumulation of suspended solids in storm water and to reduce air pollution. This effort is particularly important during spring breakup.
Open Space Maintenance Operations	<p>Relocation of Outdoor Activities – All maintenance and fabrication activities on vehicles and equipment will be performed inside or under cover unless it is not possible to do so.</p> <p>Ground Shielding – Impermeable drop cloths or other shielding means will be used during all outdoor work activities that have the potential to impact storm water quality. These activities typically include, but are not limited to, painting, metal work, and mechanical work. The purpose of ground shielding will be to catch debris, chips, drips, or over spray, so that these materials do not enter the storm drain system.</p>
Fleet Maintenance	All vehicle maintenance will be performed indoors or under a covered area. All vehicle maintenance areas will have controlled drainage, such as floor drains that do not discharge to the storm water system. Vehicle maintenance will be strictly limited to these controlled areas.
Vehicle Washing Operations	All vehicle washing will be performed indoors or under a covered area. All vehicle wash areas will have controlled drainage, such as floor drains that do not discharge to the storm water system. Engine and vehicle washing will be strictly limited to these controlled areas. Regular maintenance of the area will be performed to ensure wash waters and the resulting contaminants will not be transported by storm water to waters of the United States.
Unused Materials	Unused materials will be stored in controlled, covered areas of the site where traffic patterns are not a hazard. As necessary, materials will be stored within a secondary containment unit or above a sealed ground surface to avoid incidental contact with surface water runoff.
Drum Storage	Empty drums and drums containing petroleum products, waste, and/or recyclable materials will be stored with closed lids or bungs in controlled, covered areas of the site where traffic patterns are not a hazard. Drums will be stored within a secondary containment unit or above a sealed ground surface to avoid incidental contact with surface water runoff. Alternatively, empty drums may be stored sideways in a covered drum storage rack with bungs placed at nine o'clock and three o'clock.
Battery Storage	Old batteries will be stored in controlled, covered areas of the site where traffic patterns are not a hazard. Old batteries will be stored within a secondary containment unit or above a sealed ground surface to avoid incidental contact with surface water runoff.

Activity	Source Measure(s)
Scrap metal	Scrap metal will be stored in controlled, covered areas of the site where traffic patterns are not a hazard. As necessary, materials will be stored within a secondary containment unit or above a sealed ground surface to avoid incidental contact with surface water runoff.
Hazardous material storage	When not in use, hazardous materials will be stored in locked cabinets and segregated according to their chemical properties. Hazardous cargo storage areas will have secondary containment to contain spills and to prevent storm water runoff from flowing across these areas and thereby collecting pollutants. Secondary containment valves will be kept locked at all times and be inspected regularly. Inspection records shall be maintained at each facility. Hazardous cargo storage areas will be located where traffic patterns are not a significant hazard.
Solid Waste Transfer Activities	Solid waste will be disposed of in non-leaking dumpsters, and will be kept covered at all times to prevent garbage from blowing away and precipitation from entering and corroding the dumpsters. Any solid waste container leak will be contained so that the leakage and/or solid waste will not enter the storm drain system. The leaking dumpster will be repaired or replaced immediately. Solid waste containers will be located at least 50 feet from the nearest storm drain inlet.
Recycling	Used oil, spent fluid, old parts, old batteries, and other recyclable wastes will be collected and transported to a commercial recycling facility. Wastes will be separated and properly stored until they are picked up by the recycling company
Storm Water System Maintenance	The entire storm water system will be inspected from the surface at least once annually and at the first sign of clogging or other problems. Throughout the year, any debris that has collected in ditches or catch basins will be removed and disposed of properly to promote proper drainage and prevent pollutants from entering the storm water system. Storm water system deficiencies will be documented and repaired as logistics and funding allow.
Oil Water Separators (OWS)	Maintenance personnel will periodically inspect OWS and clean or otherwise service them as necessary. Should a leak or other threatening condition occur, corrective action will be taken immediately.

3.9 SOURCE CONTROL MEASURES

In general, source control measures are implemented to prevent potential pollutants from coming into contact with areas exposed to precipitation and to prevent potential pollutants from being discharged into the storm drain system. The Port will use the following source control measures to protect and improve the quality of storm water discharges.

3.9.1 Vehicle Fueling Areas

Vehicle Fueling Areas (VFAs) will be visually inspected periodically and/or whenever the facility is manned. Records of these inspections shall be maintained at each facility.

Record keeping may be abbreviated by allowing a check-off certifying the performance of periodic inspections. Areas to be inspected for corrosion, leaks, cracks, or other physical damage include pump foundations, connections, valves, hoses, and other fittings. Secondary containment areas will be checked regularly. If fuel has entered a secondary containment area, or if a part is found to be obviously damaged, the equipment will be shut down until the nature of the problem is determined and repaired. Should a leak or other threatening condition be found anywhere, corrective action will be taken immediately, or the fueling facility will be shut down until the problem is resolved.

- VFAs will be in compliance with all federal, state, and local regulations
- VFAs will be covered so as to prevent leaks, spills, and oily residues from washing off the equipment and into the storm drain system
- VFAs will have drainage controls to minimize the chance of storm water contamination from drips, spills, or leaks. New VFAs will have drainage controls and provisions to monitor or collect product residue before it can enter the storm drain
- Secondary containment systems will be kept free of debris, excessive accumulated snow or rain water, and other materials that might interfere with the systems' effectiveness
- Drainage from secondary containment areas that discharge directly to the Port's MS4 will be controlled by locally operated positive failsafe valves, or other positive means, to prevent unintended discharge. Valves will be kept closed and locked when not in use
- VFAs will be located where traffic patterns are not a significant hazard
- VFAs will have protective bollards to prevent spills due to collisions.

3.9.2 Tank Truck Loading Racks

- TTLRs will be in compliance with all federal, state, and local regulations
- TTLRs will have secondary containment to contain drips, spills, leaks, or product residue that may wash off of the TTLR equipment, and to prevent runoff from discharging directly into the Port's storm drain system
- TTLRs' secondary containment systems will:
 - Be designed to contain the maximum capacity of any single tank car or tank truck compartment

- Include containment curbing and a trenching system or drains with drainage to a collection tank or other device designed to handle a discharge
- Be paved or otherwise surfaced with sufficiently impermeable materials
- Be kept free of debris, excessive accumulated snow or rain water, and other materials that might interfere with the systems' effectiveness
- Have warning lights, warning signs, or a physical barrier to prevent premature vehicle movement
- Drainage from secondary containment areas that discharge directly to the Port's MS4 will be controlled by locally operated positive failsafe valves, or other positive means, to prevent unintended discharge. Valves will be kept closed and locked when not in use
- TTLRs will be located where traffic patterns are not a significant hazard
- TTLRs will have protective bollards to prevent spills due to collisions.

3.9.3 Aboveground Storage Tanks

- ASTs will have secondary containment to contain drips, spills, leaks, or product residue that may wash off of the AST equipment, and to prevent runoff from discharging directly into the Port's storm drain system
- Secondary containment systems will be kept free of debris, excessive accumulated snow or rain water, and other materials that might interfere with the systems' effectiveness
- Drainage from secondary containment areas that discharge directly to the Port's MS4 will be controlled by locally operated positive failsafe valves, or other positive means, to prevent unintended discharge. Valves will be kept closed and locked when not in use
- ASTs will be located where traffic patterns are not a significant hazard.
- ASTs that are not located within a tank farm will have protective bollards to prevent spills due to collisions.

3.9.4 Hazardous Cargo Storage

- Hazardous cargo storage areas will have secondary containment to contain spills and to prevent storm water runoff from flowing across these areas and thereby collecting pollutants
- Secondary containment valves will be kept locked at all times and be inspected regularly. Inspection records shall be maintained at each facility
- Hazardous cargo storage areas will be located where traffic patterns are not a significant hazard.

3.9.5 Snow Storage and Disposal

The Port is not authorized to dispose of snow directly to waters of the United States or directly to the MS4. Discharges from the Port's snow disposal and snow management practices are authorized under this permit when such practices are operated using appropriate BMPs required in Permit Part 3.6 (SWMP Part 8.1). BMPs may include but are not limited to ditches, detention

basins, dikes, berms, ditches, and vegetative buffers. BMPs shall be designed, operated, and maintained to prevent and reduce pollutants in the discharges to the MEP to avoid excursions above WQS in the receiving water.

All snow removal contractors and users shall be familiar with these guidelines prior to snow dump use. This shall be the responsibility of the stakeholder.

Table 3.9.5: Snow Disposal and Removal Practices

Component	Source Measure
Disposal Sites	<p>The Port snow disposal sites are in compliance with the State of Alaska snow disposal site requirements. The current primary snow storage/disposal site is located within the northern extension area. The Port is presently negotiating a teaming agreement with JBER to allow the Port to utilize their snow disposal location on base property. This section will be updated accordingly in future revisions to the SWMP.</p> <p>All snow shall be dumped starting from the back of the dump and work towards to the front of the dump. Pushing the dumped snow piles up is paramount to maintaining the volume of the area. Snow dump users need to push their dumped snow after <i>two rows</i> of piles accumulate. This ensures maximum usage of the area especially during heavy snow storms.</p>
Vehicles	<p>All snow removal vehicles traveling to and from snow dump are required to use headlights at <i>all</i> times. If snow removal equipment is equipped with amber beacons, they shall be on when conducting operations.</p>
Operators	<p>Operators of snow removal equipment shall not drive in an unsafe manner. All posted speed limit signs shall be adhered to.</p>
Silt Fencing	<p>In order to prevent snow dump contaminates from entering the POA storm drains and Cook Inlet, black silt-fencing has been installed along the down-gradient edge. Do not disturb the fence as this is an environmental control to prevent water runoff into the storm drain and receiving waters. Snow must be maintained 10’ from the black silt fence in order for it to be an effective storm water control and SWPPP (Storm Water Pollution Prevention Plan) compliant. If the fence is damaged or any storm water violations are observed, report immediately to POA Maintenance Supervisor Dennis Pollard at 343-6208 or Stuart Greydanus at 343-6202. If Dennis or Stuart cannot be reached, call Paul Rotkis at 343-6226. For all other snow dump issues, please call POA Maintenance Supervisor Dennis Pollard at 343-6208.</p>
Ditches	<p>Dumping, pushing, placing, or blowing snow into the <i>any</i> ditch is strictly prohibited. The ditch could contain a storm drain line which will discharge the melted snow into Cook Inlet. Discharging water from the snow dump is prohibited by state law.</p> <p>All dumped snow must be no closer than 10’ from the edge of the any ditch.</p>

3.10 SPILL PREVENTION AND RESPONSE PROCEDURES

Spill prevention and response procedures are a vital part of the SWMP. Employees will be trained in material handling procedures, storage requirements, and cleanup procedures that minimize the potential for spills and guide spill countermeasure action. They will be trained for how to respond and/or who to contact in case of a spill. Containment and diversion equipment also have an important role in preventing pollutants from entering storm water runoff. The Port and its Stakeholders will implement their respective spill prevention and contingency plans in concert with the SWMP. Spill prevention and response procedures to be implemented at the Port include the following measures, many of which are covered in greater detail in Stakeholder-specific Spill Prevention, Control, and Countermeasure (SPCC) Plans and CPs.

- Spill clean-up materials will be located in an unlocked area that is readily visible and/or accessible from any VFA, TTLR, AST (not located within a lined tank farm), and hazardous cargo storage area
- Signs or placards will be posted at all VFAs, stating that topping-off and unattended vehicle fueling are not permitted
- Drip pans or adsorbent pads will be placed underneath all hose connections during fuel transfers
- Completely filling or “topping off” fuel tanks often results in overfilling the tank, and it is prohibited
- Dispensing nozzles will be held with the opening upwards immediately before and after vehicle fueling so that residual fuel is not spilled on the ground surface
- All vehicle and equipment leaks will be reported and repaired as soon as possible. Leaking fluids from vehicles, equipment, or piping will be collected in drip pans or containers until appropriate repairs can be effected
- Used fluids will be promptly transferred to the proper waste or recycling drums. Full drip pans or other containers will not be left unattended
- Storage tanks, equipment, and piping will be inspected for leaks whenever used
- All petroleum products, solvents, and cleaners will be stored inside a contained area so that spills and leaks are controlled
- Tanks, containers, and drums will be stored away from direct traffic routes to prevent collisions and accidental spills
- Fuel transfers will be monitored continuously to prevent overfilling
- Mops, rags, or sorbent materials (cat litter, straw, sawdust, etc.) will be conveniently located next to all hazardous material storage locations and used to clean up and contain petroleum or chemical spills. Spills will not be washed into storm drains
- Overfill protection and leak detection devices will be installed and maintained on all USTs or ASTs that are greater than 1,000 gallons and that do not have secondary containment
- Valves connected to the storm drain system will be clearly labeled to reduce the potential for human error
- In the event of a spill, vacuum and pump systems will be used at the facility to collect both wet and dry materials in material handling areas and work areas
- Spills will be reported to the appropriate personnel as soon as they are identified

3.11 INDUSTRIAL AND HIGH RISK RUNOFF MONITORING PROGRAM

Each Stakeholder will be responsible for their own Industrial and High Risk Runoff locations, and their own monitoring program. Each Stakeholder will turn in their procedures and records of any monitoring activity to the Port for the Detailed Annual Report.

3.11.1 INDUSTRIAL HIGH RISK RUNOFF LOCATIONS

Potential pollution sources at the Port include the following:

- Materials that are used, stored, or handled
- Exposed significant materials such as those potentially found at the following locations:
 - VFAs
 - TTLRs
 - Outdoor work and storage areas
 - Transit and parking areas
 - Solid waste dumpsters
- Past spills or leaks where residual soil or groundwater contamination may be present.

3.11.2 RISK IDENTIFICATION

The most immediate potential pollutant sources at the Port are past spills of petroleum hydrocarbons that contaminated the underlying soil and groundwater. This contamination may be infiltrating into the storm drain system through joints, line breaks, and perforated subdrain sections of the storm water system. Damage resulting from the 1964 earthquake and past poor fuel storage and transfer practices have contaminated a sizeable portion of the subsurface at the Port. In November, 2012 the ADEC listed the Port in its contaminated sites database. Ongoing remediation is not being conducted at this time due to three factors: high groundwater table, tidal influence of the groundwater table, and lack of downstream receptors. The ADEC and the U.S. Environmental Protection Agency (EPA) are aware of this condition. The installation of new storm drain infrastructure as part of the Port's ongoing expansion project will help alleviate the infiltration of contaminated groundwater into the storm drain system.

Other processes, activities, and materials storage practices at the Port that have reasonable potential to contribute pollutants to storm runoff – if proper procedures and precautions are not implemented – are listed below.

- Bulk Fuel Storage: Bulk fuel storage facilities are considered high risk runoff facilities because of the volume of fuel storage and transfer and the potential for petroleum products to come in contact with storm water through spills, drips, or leaks
- Vehicle Maintenance: Vehicle maintenance facilities at the Port use materials and generate wastes that have the potential to pollute storm water if leaks, drips, or spills occur in areas exposed to precipitation, and if runoff is allowed to enter the storm drain. Activities that can pollute storm water include parts and shop cleaning, vehicle washing, improper storage of vehicle fluids, and improper storage of recyclable parts containing oils and lubricants

- **Chemical and Petroleum Product Use and Storage:** The use and storage of chemicals and chemical-containing products – such as pesticides, herbicides, and fertilizers – and the use and storage of oil-based petroleum products has the potential to pollute storm water if leaks, drips, or spills occur in areas exposed to precipitation, and if runoff is allowed to enter the storm drain
- **Fuel Pipelines:** Underground and aboveground fuel pipelines have the potential to pollute storm water if they are not properly maintained and tested. Leaks, drips, and spills from pipelines can enter the storm water system or can be exposed to precipitation, allowing runoff to enter the storm drain
- **Vehicles, Freight Trucks, and Container Cranes:** Drips or leaks of fluids from vehicles, freight trucks, and container cranes could potentially have an adverse impact on storm water quality in areas exposed to precipitation
- **Hazardous Cargo Storage:** Storage of hazardous inbound and outbound cargo has the potential to pollute storm water runoff if leaks, drips, and spills are exposed to precipitation and runoff is allowed to enter the storm drain
- **Vehicle Fueling Areas and Tank Truck Loading Racks:** Vehicle and truck fueling areas that are exposed to rainfall and/or do not have secondary containment, diversionary structures, and well established Standard Operating Procedures (SOPs) to control spills have the potential to pollute storm water through leaks, drips, spills, or via rainfall washing pollutants off of the machinery
- **Loading/Unloading Operations:** Materials spilled, leaked, or lost during loading or unloading may collect on pavement, soil, or on other surfaces and may be carried away by storm runoff or when the area is cleaned. Rainfall may also wash off pollutants from machinery used to load or unload materials
- **Solid Waste Storage:** Dumpsters that are exposed to rainfall, are poorly maintained, and/or do not have secondary containment or diversionary structures to control spills have the potential to contribute chemicals and solid waste to the storm drain system
- **Outdoor Work Activities:** Outdoor work activities including painting, metal work, or mechanical work can create debris or over spray that may enter the storm drain system if proper pollution precautions are not followed
- **Construction Activities:** Construction activities have the potential to degrade water quality through the introduction of sediment laden or polluted runoff to the storm drain system
- **Cement Storage:** Cement storage and conveyance systems have the potential to pollute storm water if a release were to occur. Facilities should be maintained properly and inspected regularly to ensure the safety of workers and storm water quality.

3.12 INDIVIDUAL CONTROLS AND MEASURES

The following is a description of BMPs, source reduction and elimination measures, and source control measures that are unique to each Port Stakeholder facility.

3.12.1 AFSC

AFSC has two storm water collection areas, the operations area (including the TTLR) outside the lined tank farm, and the lined tank farm in which the bulk storage tanks are located.

The TTLR in the operations area is exclusively for emergency use, and is only to be used if the pipeline to Ted Stevens Anchorage International Airport should become inoperable and fuel must be transferred by truck. Storm water accumulations in the TTLR will be visually inspected for petroleum sheen prior to discharge. Storm water without sheen will be discharged onto grade, eventually flowing to the MS4. If sheen is present, the water will be collected for off-site disposal or on-site treatment prior to disposal pending ADEC approval.

For the lined tank farm area, AFSC will use the “no sheen” criterion to determine whether to release the storm water to the Port’s MS4. This criterion is based on Alaska law, which allows discharge from secondary containment areas based on the absence of sheen. As an added protection measure, all storm water will be discharged through an OWS prior to flowing to the MS4. If sheen is detected, however, further testing and investigation will be conducted to determine its source prior to discharge. Whether or not sheen is detected, AFSC will provide annual quantitative testing of storm water that is discharged through the OWS. AFSC will collect and test storm water from two locations: a surface sample from the secondary containment and at the point of discharge just beyond the OWS. Test results will be reported in the Detailed Annual Report. Process waste water discharged from the tank bottom water collection unit will be collected in a separate tank for partial treatment on-site; residual water will be treated off-site.

ASIG is planning on implementing new BMP for snow piles. This effort will include monitoring snow melt for debris and sediment. If debris or sediments are detected, actions will be taken to remove and/or eliminate the pollutant. Controls will be established as necessary.

3.12.2 TESORO

Tesoro has two storm water collection areas, the operations area (including the TTLR and the VFA) outside the lined tank farm and the lined tank farm in which the bulk storage tanks are located. The storm water that collects in the operations area, with the exception of the TTLR, drains to the MS4. The TTLR is covered and captures little storm water; the TTLR drains to an UST, the contents of which are disposed of off-site.

For the lined tank farm area, Tesoro will use both the “no sheen” criterion and a Total Aqueous Hydrocarbon (TAqH) test to determine whether to release the storm water to the Port’s MS4. The TAqH test is typically an annual effort, performed as an additional safeguard to checking for sheen. Results from the TAqH test will be included in the Detailed Annual Report. The remainder of the year, the no-sheen criteria is used exclusively. Alaska law allows discharge from secondary containment areas based upon the absence of sheen. If there is no sheen, storm water may be discharged without a discharge permit. If there is sheen, Tesoro will call a third party contractor to come and pump out the contaminated water for offsite treatment and disposal.

3.12.3 MATSON

Matson utilizes a 12,000-gallon fuel tank south of the maintenance building adjacent to a previously abandoned fueling bay. This VFA provides a covered fueling area for freight trucks and maintenance and support vehicles. An underground storage tank collects and contains potential drips and spills. During refueling, adsorbent pads will be placed on the ground or held beneath the fueling nozzle to catch small drips. Fueling nozzles will be of the type designed to automatically shut off to prevent overfills. The former temporary VFA – which consisted of an AST at the north end of the maintenance building – has been decommissioned and is no longer used. It was removed in May, 2013.

A floor-drain system with an OWS is installed in the Mini-Maintenance Building at the southern end of Matson's lease area.

Matson uses oversized awnings to cover their scrap metal bins, thereby minimizing the amount of precipitation that enters the bins.

Matson will store old batteries in controlled, covered areas of the site where traffic patterns are not a hazard. Old batteries will be stored within a secondary containment unit or above a sealed ground surface to avoid incidental contact with surface water runoff. In addition Matson will use a contracted service to remove used batteries from the facility for proper disposal on a weekly basis. This minimizes the amount of time that batteries are susceptible to accidents, spills, or storm water contamination.

Matson will place sorbent socks around storm drain inlets within their lease area during rain events. Sorbent material will be inspected and replaced following storm events; used material will be incinerated onsite. This BMP addresses non-Matson vehicles that travel through and/or park on site.

3.12.4 TOTE

TOTE has a unique fuel delivery system requiring that special precautions be taken to prevent inadvertent spills from occurring in the yard. Their fuel delivery system consists primarily of one to two (depending on workload) roving tanker trucks that deliver fuel to the freight trucks and refrigeration generators located throughout the yard. TOTE also uses two other roving dispenser/tanker trucks, one that dispenses diesel and another that dispenses gasoline, to fuel their licensed vehicles. Fuel contained in these trucks is delivered by an off-site company. They roam the site filling the licensed vehicles. TOTE's fueling fleet previously included a 2,000-gallon fuel tank which sat on a trailer chassis; this fuel tank was removed in July 2014. In order to handle drips and spills, all roving tank trucks will have available spill response materials. During refueling, adsorbent pads will be placed on the ground or held beneath the fueling nozzle to catch small drips. Fueling nozzles are equipped with automatic shut off devices to prevent overfills.

To avoid storing hazardous materials any longer than necessary, TOTE generally will not allow outgoing hazardous material shipments to arrive at the TOTE terminal any earlier than 96 hours prior to departure. Incoming hazardous material shipments will be transported off-site as soon as

practicable. In the meantime, they will be stored in a designated area, near a trailer containing hazardous material spill response supplies.

Snow will not be stockpiled over or adjacent to any storm drains.

TOTE will use trash receptacles and scrap metal bins with solid covers.

3.12.5 ABI

As of 31 December 2015, the facilities were still under construction. A description of the industrial controls will be included in the 2016 Detailed Annual Report provided construction is completed in 2016.

3.12.6 DELTA WESTERN

Delta Western collects storm water into a containment area. Prior to discharging from a containment unit, tests are conducted and results recorded on a storm water inspection form. Test results include sensory detection of methanol (organoleptic confirmation), confirmation of dreger tube test, visible signs of leaks or spills, and notes.

Delta Western has their control station located within containment at the TTLR. A non-metallic cargo hose is utilized to connect the tank barge to the TTLR when cargo is being transferred. The first valve is located outside the tank farm containment wall, located within a secondary containment pad that drains into the tank farm secondary containment area.

4. MONITORING, EVALUATION, RECORDKEEPING, AND REPORTING REQUIREMENTS

4.1 MONITORING PROGRAM PLAN

The Monitoring Program Plan (Appendix H) is designed to:

- Assess compliance with the permit;
- Measure the effectiveness of this SWMP;
- Measure the chemical, physical, and biological impacts to the receiving waters resulting from storm water discharges according to the Port's Quality Assurance Project Plan (QAPP);
- Characterize storm water discharges;
- Identify sources of specific pollutants; and
- Detect and eliminate illicit discharges and illegal connections to the MS4.

4.1.1 CONDUCTING WATER QUALITY MONITORING

When the Port conducts water quality monitoring, it will comply with the following:

- Representative Monitoring - All sample and measurements will be representative of monitored activity.
- Test Procedures - Monitoring will be conducted according to test procedures approved under 40 CFR Part 136 (adopted by reference at 18 AAC 83.010) – unless otherwise specified.
- Industrial and High Risk Runoff Monitoring - Refer to Table 8.1 for additional information and Section 8.4 of this SWMP.

4.1.2 STORM WATER DISCHARGE MONITORING (WET WEATHER)

The Port is required to conduct a storm water discharge monitoring program (Appendix K) which meets the following minimum requirements:

- Develop a Storm Water Outfall Monitoring Plan consistent with monitoring objectives described in Part 9.1 and 9.1.1 of this document (Part 4.1 of the permit).
- The Port is required to monitor representative outfalls and/or instream monitoring locations to characterize the quality of storm water discharges from the MS4. The outfalls selected by the Port in the Storm Water Outfall Monitoring Plan must be representative of major land uses at the Port or from the major Industrial and High Risk Runoff locations identified in Part 9.1.1(c) (Permit Part 4.1.2.3). For example: precipitation that accumulates and is discharged from the bulk fuel storage tank farms.
- By April 30, 2016, the Port will begin monitoring the storm water outfalls identified in the Storm Water Outfall Monitoring Plan during a measurable storm event at the frequency identified in Table B: Outfall Monitoring Requirements in Section 5.3 of this SWMP.
- Refer to Appendix H for more information regarding dry and wet weather outfall monitoring.

4.1.3 DISCHARGE MONITORING REPORT

Monitoring results must be recorded on a Discharge Monitoring Report (DMR) from (EPA No. 3320-1) or equivalent, and submitted annually for the previous twelve-month period along with the Detailed Annual Report (Appendix H).

4.1.4 QAPP

A QAPP (Appendix H) for all analytical monitoring to be conducted, including but not limited, to discharge detection and elimination activities described in Part 5.0 of this document. The Port shall submit written notice to ADEC within 6 months of the effective date of this permit affirming that its QAPP is up to date and has been developed or updated and implemented. The QAPP is designed to assist in planning for collection and analysis of water samples in support of the SWMP and in explaining data anomalies when they occur.

All sample collection and analysis activities must be handled using ADEC-approved QA/QC and chain-of-custody procedures described in *Requirements for Quality Assurance Project Plans* (EPA/QA/R-5), *Guidance for Quality Assurance Project Plans* (EPA/QA/G-5). The adequacy of the QAPP must be reviewed annually based on permit compliance activities and sampling results, and document the review in the Detailed Annual Report.

4.1.5 NO SAMPLE COLLECTED

If no sample was collected due to adverse climatic or tidal conditions, in lieu of sampling data a description of why samples could not be collected, including available documentation of the event, must be submitted. Adverse climatic conditions which may prohibit the collection of samples includes weather conditions that create dangerous conditions for personal (such as local flooding, high winds, tsunamis, high tides, electrical storms, etc.) or otherwise make the collection of a sample impractical (drought, extended frozen conditions, etc.). This waiver may not be used more than once during a two year period.

4.1.6 ONGOING EFFORTS

Continue ongoing efforts to detect presence of illicit connections and improper discharges to MS4. All portions (but not necessarily all outfalls) of the MS4 must be screened at least once during the permit term.

4.1.7 COPIES TO ADEC

Copies of the Monitoring Program Plan and QAPP must be made available to ADEC upon request.

4.1.8 RECORD OF MONITORING INFORMATION

Requirements for records of Monitoring Information must include (Section 4.1.3 of permit):

- The date, exact place, and time the samples or measurements were taken;
- The names(s) of the individual(s) who performed the sampling or measurements;
- The date(s) upon which analysis of each sample was performed;
- The names of the individuals who performed each analysis;
- The analytical techniques or methods used; and
- The results of each analysis.

4.1.9 EXTRA MONITORING

If monitoring occurs more frequently than required by the permit using test procedures approved under 40 CFR Part 136 (adopted by reference at 18 AAC 83.010), or otherwise specified by the permit, the results of this monitoring must be included with the data submitted as part of both the Detailed and Summary Annual Reports.

4.2 ANNUAL EFFECTIVENESS ASSESSMENT

The Port will, at least annually, report on the effectiveness of its SWMP. Included in this assessment will be an evaluation of the SWMP's compliance with permit conditions, appropriateness of identified BMPs, and progress toward achieving identified measurable goals for each of the minimum control measures set throughout this document. The assessment will be documented in the Detailed Annual Report. The annual effectiveness assessment will:

- Use the monitoring and assessment data described in SWMP Part 9.1 to specifically assess the effectiveness of the following:
 - Each significant activity/control measure or type of activity/control measure implemented;
 - Implementation of each major component of the SWMP (Public Education/Involvement, Illicit Discharges, Construction, Post-Construction, Pollution Prevention and Good Housekeeping); and
 - Implementation of the SWMP as a whole.
- Identify and use measurable goals, assessment indicators, and assessment methods for each of the items listed above.
- Document compliance with permit conditions
- Based on the results of the effectiveness assessment, the Port must annually review its activities or control measures to identify modifications and improvements needed to maximize SWMP effectiveness, as necessary to achieve compliance with the permit. The Port must develop and implement a plan and schedule to address the identified modifications and improvements. Port activities/control measures that prove to be ineffective or less effective than needed must be replaced or improved upon until effective.
- The effectiveness assessment will be reported in the Detailed Annual Report.

4.3 ANNUAL REPORTS

4.3.1 SUBMISSION DEADLINES

The Detailed and Summary Annual Reports for the previous twelve months must be submitted to ADEC at the address in Part 4.5. The Detailed and Summary Annual Report must clearly refer to the permit requirements and describe in quantifiable terms the status of activities undertaken to comply with each requirement.

Copies of all Detailed Annual Reports will be made available to the public through the Port maintained website.

Table 4.3.1: Submission Deadlines for Annual Reports

Reporting Period	Submission Deadline
1 st year Annual Report (permit issuance date – December 2015)	February 15, 2016
2 nd year Annual Report (January 1, 2016 – December 31, 2016)	February 15, 2017
3 rd year Annual Report (January 1, 2017 – December 31, 2017)	February 15, 2018
4 th year Annual Report (January 1, 2018 – December 31, 2018)	February 15, 2019
5 th year Annual Report (January 1, 2019 – permit expiration date ¹)	February 15, 2020
Note: Unless the permit is extended to or past December 31, 2019; in which case December 31, 2019. Subsequent reporting periods will follow similar format for the calendar year with submission deadline of February 15th the following year	

4.3.2 SUMMARY ANNUAL REPORT

Using the MS4 – Summary Annual Report template, document a summary of the past year’s activities, all of the information required on the form must be submitted. A copy of the template can be found in Appendix D of the permit.

4.3.3 DETAILED ANNUAL REPORT

A detailed Annual Report must also be submitted that addresses the activities described in the SWMP document required in Part 2.0 of the permit. At minimum the Annual Report must include:

- An updated SWMP document as required in Permit Part 2.4
- A description of the effectiveness of each SWMP program component or activity
- Planned activities and changes for the next reporting period for each SWMP program component or activity
- An evaluation of compliance with requirements of this permit, the appropriateness of identified BMPs, and progress toward achieving identified measureable goals of the SWMP for each minimum control measure
- Results of any information collected and analyzed during the previous twelve month reporting period, including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP

- A summary of the activities the permittee plans to undertake during the next reporting cycle (including an implementation schedule) for each minimum control measure
- Proposed changes and complete changes to the SWMP, including changes to any BMPs or any identified measurable goals for any minimum control measure
- Description and schedule for implementation of additional BMPs that may be necessary, based on monitoring results, to ensure compliance with applicable WQS
- Notice if the permittee is relying on another entity to satisfy some part of the permit obligations, if applicable.

The Detailed Annual Report must also cover the requirements from Parts 3.0 and 4.0 of the permit.

4.4 RECORDKEEPING

4.4.1 RETENTION OF RECORDS

The permittee must retain records and copies of all information including: all monitoring, calibration and maintenance records and all original strip chart recordings for any continuous monitoring instrumentation; copies of all reports required by this permit; copies of DMRs; a copy of the APDES permit; and records of all data used to complete the application for the permit. These records must be retained for a period of at least three years from the date of the sample, measurement, report or application, or for the term of the permit, whichever is longer. This period may be extended at the request of the ADEC at any time. Records also include all information used in the development of the storm water management program, all monitoring data, copies of all reports, and all data used in the development of the permit application.

4.4.2 AVAILABILITY OF RECORDS

The Port is required to submit the records referred to in Part 9.4.1 to ADEC only when specifically asked to do so. The permittee must retain the SWMP required by the permit (including a copy of the permit language and all Annual Reports) at a location accessible to the ADEC. The Port is required to make records, including the permit application and the SWMP, available to the public if requested to do so in writing. The public may view the records during normal business hours.

4.5 ADDRESS

Submittals required by this permit must be made to the following address specified below:

State of Alaska
Department of Environmental Conservation
Division of Water
Compliance and Enforcement Program
555 Cordova Street
Anchorage, Alaska 99501
Telephone Nationwide (877) 569-4114
Anchorage Area / International (907) 269-4114
Fax (907) 269-4604
Email: dec-wqreporting@alaska.gov

In addition, copies will be provided to the team leader (Port) and to each team member.