

TACOMA RAIL STORMWATER POLLUTION PREVENTION PLAN



TACOMA PUBLIC UTILITIES

- ✘ Tacoma Power
- ✘ Tacoma Water
- ✘ Tacoma Rail

TACOMA RAIL

- × Shortline Railroad
- × Owns and Operates on 23 miles of track
- × 16 Locomotives
- × Equipment Maintenance
- × Administration

ISGP ADMINISTRATION

- × Permit administered by TPU Environmental Compliance Office – Offsite
- × Eases compliance for onsite personnel
- × Remote facility increases challenges

SWPPP DEVELOPMENT – TAKE 1

- ✘ Template from Trade Association
- ✘ Plug & Play
- ✘ Identify/Implement BMPs
- ✘ Simple Compliance
- ✘ Challenges

BMPs – TRACK PANS



BMPS – OIL WATER SEPARATORS



BMPS – LOCOMOTIVE WASHING



BMPS - HOUSEKEEPING



PERMIT COMPLIANCE

- ✘ Sampling Protocols
 - + Sample Locations
 - + “Qualifying” Events
- Benchmark Parameters
- Analytical Results
- Consistent Attainment

SWPPP SAMPLING



ADDITIONAL BMPS

- ✘ Analyses showed need for additional efforts
- ✘ Routine inspections identified areas for further physical improvements
- ✘ Administrative changes implemented

BMPS – REDIRECT BUILDING DISCHARGES



BMPS – SWEEP PAVED SURFACES



BMPS - SECONDARY CONTAINMENT



BMPS - ADMINISTRATIVE



BMPS - ADMINISTRATIVE



SWPPP DEVELOPMENT - TAKE TWO

- ✘ Previous plan inflexible and inadequate
- ✘ Copyright and reproduction issues
- ✘ New SWPPP created with DOE template

INSPECTIONS

- ✘ TPU Environmental Compliance Office
- ✘ City of Tacoma
- ✘ Department of Ecology
 - + Improvements required
 - + SWPPP inadequate

2010 ISGP

- ✘ New benchmarks
- ✘ Inspections
- ✘ Response levels
- ✘ Sampling protocols

SWPPP DEVELOPMENT – TAKE THREE

- ✘ New DOE SWPPP template
- ✘ New BMPs
- ✘ Inspections
- ✘ Staff training

THE FUTURE?

- ✘ SWPPP and stormwater discharge compliance are always evolving
- ✘ The ISGP will change.....again