



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

September 16, 2020

Eric Toews, Deputy Director
Port of Port Townsend
2701 Jefferson Street
Port Townsend, WA 98368

Dear Eric Toews:

Thank you for the opportunity to comment on the determination of nonsignificance for the Port of Port Townsend Comprehensive Scheme of Harbor Improvements Update Project. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

SPILL PREVENTION, PREPAREDNESS, AND RESPONSE:

Brittany Flittner, Project Specialist (360) 584-4490 | brittany.flittner@ecy.wa.gov

Ecology recommends review of the Pollution Prevention for Washington State Marina Handbook <https://wsg.washington.edu/wordpress/wp-content/uploads/marina-handbook.pdf> and keep these best practices in mind as you conduct this work.

Additionally, if the port is considering any additional improvements, Ecology recommends you consider extending the double wall piping at the Port Townsend Boat Haven Marina fuel dock the remaining several feet to the fuel dispenser sump.

The Spill Prevention, Preparedness, and Response Program at Ecology conducts annual inspections on Class 4 facilities. During our facility inspection at the Port Townsend Boat Haven Marina fuel dock, we observed that the protective double wall piping runs from the seawall transition sump to the fuel dispenser, but that it ends several feet short of the fuel dispenser sump. Double-wall fuel piping helps prevent spills by allowing fuel that leaks from the inner pipe to flow through the outer pipe and drain into a sump with a leak detection sensor. The current double wall piping ends a few feet from the dispenser sump and becomes a single wall system at this point, which is directly over the water. This negates the additional spill protection provided by the double-wall piping and sump early warning leak detection. Terminating the double wall fuel line outside of a containment sump goes against best practices and manufacturers recommendations. While the current installation is not out of compliance with WA State regulations, it is not ideal and does not function as designed or desired.

Please contact Brittany Flittner, Project Specialist for the Spills Program, at 360-584-4490 for questions.

Eric Toews
September 16, 2020
Page 2

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(GMP:202004599)

cc: Brittany Flittner, SPPR