

June 10, 2005

To: Joe Burcar  
Planning & Community Development

From: Anathalie Dawkins  
Health Department

Re: SCUP, SDP and SPR #387/04 – NICHOLS BROTHERS BOAT BUILDERS

Parcel Nos. S6655-00-00R01-0, S6655-00-00R04-0, S6655-00-00R11-0,  
S6655-00-00R17-0, S6655-00-00R18-0, S6655-00-00R19-0,  
S6655-00-04000-0, S6655-00-11000-0 and S6655-00-12000-0

S7085-00-00014-0

S8290-00-00R01-0, S8290-00-00R03-0, S8290-00-00021-1,  
S8290-00-00021-2, S8290-00-00021-3, S8290-00-00022-4,  
S8290-00-00053-2 and S8290-00-00053-2

After reviewing the requested information, office finds the following:

1. The purpose and scope of the Site Plan Review and associated land use applications are described on Page 3 of the SPR application. In summary, all current and proposed changes (i.e. extend hours of operation, construct a deep water rail system, enclose boat fabrication, construct new parking lot, etc...) in site operations will be evaluated. Please refer to Pages 8 – 10 of the SPR application for a description of the details and phasing of the proposed changes in site operations.
2. According to the applicant, the primary site (boat fabrication facility) is served by the Freeland Water District. The accessory structures located west of Cameron Road and north of Shoreview Road are served by two wells.

3. The following Site Registration Sheets (SRs) have been filed with this office and indicate that the corresponding parcels are generally capable of supporting on-site sewage disposal systems:
  - a) SR #82-520, Part of Parcel No. S8290-00-00022-4
  - b) SR #83-601, Part of Parcel No. S8290-00-00022-4
4. The following As-Built documents have been filed with this office and are located on the corresponding parcels:
  - a) As-Built #584-73, Part of Parcel No. S8290-00-00021-1
  - b) As-Built #744-77, Part of Parcel Nos. S7085-00-00014-0 and S8290-00-00021-1 (Off-Site Drainfield Easement, Auditor's File Number 326315)
  - c) As-Built #286-78, Part of Parcel Nos. S8290-00-00021-1 and S8290-00-00022-4
  - d) As-Built #061-03, Parcel No. S6655-00-11000-0
  - e) As-Built #(No Record), Parcel No. S6655-00-04000-0 (Off-Site Drainfield Easement, Auditor's File Number 84006575)
5. A "File Only As-Built" for the existing on-site sewage disposal systems serving the primary site was submitted to this office in September 2002. This office has not approved the document nor does it represent an on-site sewage disposal system that this office has approved prior to installation.
6. A new on-site sewage disposal system (Septic Permit #205-03SFR and Off-Site Drainfield Easement and Operation and Maintenance Agreement, Auditor's File Number 4090968) to serve the site has been installed and an as-built document received in this office. The design capacity of the on-site sewage disposal system is 1,500 gallons per day.
7. A letter from the Freeland Water District committing up to ten additional equivalent residential units to the proposal has been received in this office.
8. The proposal addresses the following Best Management Practices (BMPs) and program requirements:
  - a) Marinas, Boat Yards, Boat Building, Boat Maintenance and Boat Repair Operations
  - b) Fueling Stations
  - c) Vehicle & Equipment Washing and Steam Cleaning
  - d) Loading & Unloading of Liquids
  - e) Above Ground Tank Storage

- f) Container Storage
- g) Emergency Spill Cleanup Requirements
- h) Solid and Hazardous Waste Management
- i) Spray Painting Operations
- j) Sandblasting Operations
- k) Equipment/Vehicle Maintenance and Repair

Note: This office is continuing to review the applicant's response regarding its work practices and BMPs. Additional comments regarding these matters will be provided as soon as they are available.

Please have the applicant provide the following information so that this office can continue its review of the proposal:

1. A copy of the following:
  - a) "Material Inventory" list contained in Appendix A of the Stormwater Pollution Prevention Plan.
  - b) SARA Title III Toxic Release Inventory, Form R
2. In a May 25, 2005, letter from NBBB to the Island County Planning & Community Development Department, NBBB states that it "does not currently have the proposed proper facilities to unload liquids..." Please have the applicant describe the measures it currently uses to minimize spills when the loading and unloading of liquids occurs at the site. In addition, please describe the methods that will be incorporated into the boatyard improvements to address this activity in the future.

Following review of the information requested above, additional comments regarding SPR approval will be provided. These comments may include a request for additional information and/or additional requirements for SPR approval.

Based upon the information available to this office at this time, the following requirements will apply for SPR approval:

1. The as-built document received in this office must be approved.
2. This office understands that NBBB is working with the State Department of Ecology on revisions to its current Storm Water Pollution Prevention Plan (SWPPP). The current plan discusses numerous BMPs and work practices that have been reviewed by this office for compliance with groundwater protection requirements. To ensure continued compliance, this office must review the final draft of the updated SWPPP.

Note: For example, page 18 of the current SWPPP discusses cleaning tools covered with water-based paints in sinks connected to a sanitary sewer or in portable containers. Because this site is served by an on-site sewage disposal system and not a sanitary sewer, the second option for cleaning the tools must be exercised, cleaning the tools in portable containers.

3. According to the Phase 3, Year 8 – 15, Building Plan, the new on-site sewage disposal system is located in a new production area that will be paved with concrete. To ensure continued compliance with on-site sewage disposal methods, the following will be a condition of SPR approval:

Prior to commencement of development under Phase 3, the applicant must contact this office to ensure that an alternate method of sewage disposal that complies with ICC 8.07C is identified to serve the existing site operations.

/ad

cc: file