

**Stormwater Whole Effluent Toxicity (WET)
Testing at Seattle-Tacoma International Airport**

Final Report

May 2000

AR 044473

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Table of Contents

Acknowledgements	1
1 Executive Summary.....	3
2 Introduction	5
2.1 WET Testing Background	6
2.2 Sampling Methods.....	7
2.3 STIA Storm Drainage Subbasins	8
3 Results and Discussion.....	11
3.1 General results.....	11
3.2 SDN1 source-tracing.....	13
3.2.1 Summary of source-tracing results.....	15
3.2.2 Field Investigations	16
3.2.3 Sampling Locations.....	19
3.2.4 Initial Screening Samples.....	20
3.2.5 Subsequent WET Testing and Chelation Results.....	22
4 Conclusions.....	29
5 References.....	31
6 Appendices	35
6.1 Appendix A WET Testing Data Summary	37
6.2 Appendix B Photographs.....	41
6.3 Appendix C Source Tracing Results	45
6.4 Appendix D Matrix for Interpreting Chelation Test Results	49

List of Tables

Table 1 WET Testing Summary.....	12
Table 2 Additional WET Test Metrics	12
Table 3 Chelation Testing Results.....	27
Table 4 Synthetic Runoff WET Test Results.....	28

Table 5 Synthetic Runoff Metals Concentrations (mg/l) 28

List of Figures

Figure 1 STIA Storm Drainage Map 9
Figure 2 Boxplot of Zinc in STIA Stormwater Samples 14
Figure 3 SDN1 Subbasin Map 17
Figure 4 Sampling Locations..... 18
Figure 5 Copper in Initial Screening Grab Samples..... 22
Figure 6 Zinc in Initial Screening Grab Samples..... 23
Figure 7 Copper in composite Samples 27
Figure 8 Zinc in composite samples..... 28

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1 EXECUTIVE SUMMARY

During a twelve month period in 1998-99, the Port of Seattle characterized the whole effluent toxicity (WET) of at least two stormwater samples from four outfalls at Sea-Tac International Airport (STIA.) This WET testing satisfies the requirements of Special Condition S10 of the Port's NPDES permit (WA-002465-1.) The WET tests used two aquatic organisms, a water flea (*Daphnia pulex*) and the fathead minnow (*Pimephales promelas*) to characterize the acute toxicity of flow-weighted composite stormwater samples taken during two different storm events. Two of these outfalls were sampled on additional occasions to corroborate results from the first two tests. The Port has previously submitted the WET testing data to Ecology. This final report summarizes all results and subsequent information gathered pursuant to the permit requirement.

Subbasins SDE4 (002), SDS3 (005), SDN1 (006) and SDN4 (011) were sampled for WET testing. All test results for outfalls SDS3 and SDN4 met the Washington Department of Ecology performance standards for survival for each organism. These two outfalls drain 79% (492 ac) of the airfield runways and taxiways, or 51% of the total storm drainage area of the airport. Nine of ten test results for outfall SDE4, which drains 149 acres mostly consisting of access roadways and the terminal and cargo building rooftops, also met the performance standards. One of the fathead minnow results for an SDE4 sample fell just below the performance standard. In contrast, seven of nine WET results for outfall SDN1 fell below the performance standards and led to a subsequent source-tracing investigation.

Supplemental sampling and analysis indicated that metals were the primary source of toxicity in the SDN1 samples. After removal of metals by chelation with EDTA, survival improved dramatically. Comparing these results to the available literature indicated that zinc was the likely source of toxicity. Further

investigations revealed that about 2 acres of zinc-galvanized metal rooftop on the two AFCO Air Cargo buildings was the principal source of the zinc. Synthetic runoff samples obtained by spraying domestic water on the rooftops also exhibited toxicity and considerable zinc.. The Port is investigating alternatives to remedy the apparent source of toxicity originating from a tenant-owned facility. Follow up sampling will demonstrate the effectiveness of the remedy selected.

2 INTRODUCTION

The Port of Seattle owns and operates Seattle-Tacoma International Airport (STIA) which lies about midway between the cities of Seattle and Tacoma, Washington. The airport was built in the 1940s and expanded throughout the years to become the 18th busiest airport in the U.S. (POS, 1999a.) As the airport grew, the areas surrounding the airport urbanized and incorporated as the cities of Seatac, Des Moines, and Burien.

STIA storm drainage discharges from 14 principal subbasins through a variety of outfalls; four that drain to Miller Creek¹, eight that drain to Des Moines Creek, and two that drain to a City of Seatac stormwater system. The storm drain system (SDS) connected to these outfalls drains a 963 acre area, which contains about 44% impervious surfaces. Another 370 acres of impervious surfaces where aircraft are serviced (terminal gates and ramps) drain to the Industrial Wastewater System (IWS) and the Industrial Wastewater Treatment Plant (IWTP.) The IWTP discharges directly to Puget Sound through a marine outfall that combines discharges from the nearby Midway Sewage Treatment plant. The IWTP was not monitored as part of the WET testing, therefore this report pertains only to SDS discharges.

In 1994, the Port secured a National Pollutant Discharge Elimination System (NPDES) permit for the stormwater and IWTP discharges. The required intensive stormwater monitoring program has been in place since 1994, and has generated a considerable volume of sample data. As another part of this permit, the Port implements a Stormwater Pollution Prevention Plan (SWPPP, POS 1998) and stormwater best management practices (BMPs.) The permit was renewed in 1997 and a revised permit took effect in March 1998. Special

¹ Miller and Des Moines Creeks flow directly to Puget Sound.

Condition S10 of the Port's NPDES permit requires the Port to conduct WET testing on stormwater samples from subbasins SDE4, SDS3, SDN4 and SDN1 for two storm events. These four subbasins encompass 68% of the total SDS service area and contain most of the landside and airfield activity.

2.1 WET Testing Background

In Washington state, only eleven NPDES permittees have performed WET testing on stormwater or a mix of stormwater and industrial wastewater (WDOE, 1998a.) WET testing is a common compliance requirement for point source wastewater discharges such as pulp mills and wastewater treatment plants. WET testing improves upon chemical-specific testing because it measures aggregate toxicity, or lack thereof, addresses unknown toxicants, and takes bioavailability into account.

In accordance with EPA protocols (EPA, 1991), WET testing at STIA was performed on 100% stormwater samples plus a series of samples tested at specific dilutions. Results are expressed as percent survival for the 100% sample plus the LC50, NOEC and LOEC estimates generated by the dilution series². Source-tracing in subbasin SDN1 used 100% (undiluted) samples only

All WET testing was performed by Parametrix, Incorporated, (1999a-e) and followed the state and federal guidelines (WDOE 1998b, EPA 1991.) WET testing and other analyses were initiated within acceptable holding times.

² The LC50 is the concentration of sample where 50% survival of the test organism occurred. The no observed effect concentration (NOEC) is the maximum concentration of the test sample that produces no statistically significant harmful effect on the test organisms compared to controls in a specific test. The lowest observed effect concentration (LOEC) is the lowest concentration that has a statistically significant deleterious effect on test organisms compared to controls in a specific test (Rand, 1995.)

Chemical specific analyses were conducted by Aquatic Research, Incorporated, which is an Ecology-accredited laboratory. All WET testing data reports have been previously submitted to Ecology for review.

2.2 Sampling Methods

All samples tested were collected as flow-weighted stormwater composites using ISCO model 3700 automatic samplers and model 4150 or 4230 flowmeters³. Samples generally represented the majority of runoff and are thus considered as event-mean concentrations (EMCs), a common term used in the literature to judge intra-event representativeness and inter-event comparability of a stormwater sample. Composite samples taken for the SDN1 source tracing study were collected concurrently using three automatic samplers programmed to sample a similar duration of the hydrograph from each upstream source area. The SDN1 source tracing also used grab samples taken automatically and manually at several of the upstream locations. Quality assurance procedures and quality control samples were adequate to ensure valid results. The results of the Port's routine quality control field blanks and duplicates indicate ongoing effective sampling techniques (POS, 1999c.)

Samples were collected using the "clean techniques" approach for trace metal sampling (EPA method 1669) adapted for stormwater sampling (EPA 1995, POS 1999d.) Results from field equipment blanks indicated that these techniques were generally adequate. Ecology reviewed an outline of the Port's sampling protocol in June 1999 and agreed the sampling procedures satisfied the requirements of clean techniques (POS 1999e.)

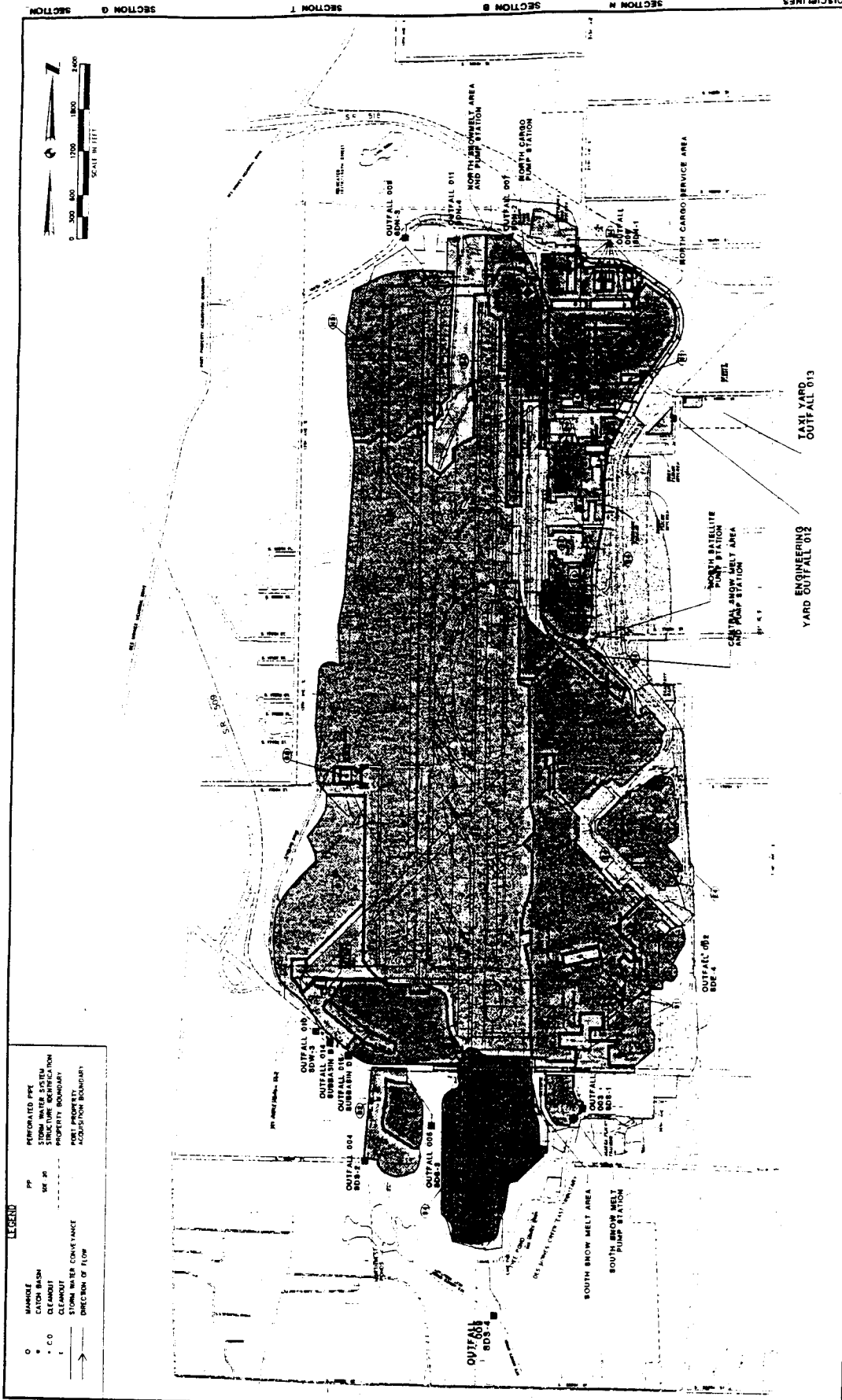
³ Sampling procedures for WET testing work were consistent with the Port's routine NPDES stormwater monitoring program, described in the Ecology-approved "Procedure Manual for Stormwater Monitoring at Sea-Tac International Airport, revision 6, April 22, 1999" (POS 1999b)

2.3 STIA Storm Drainage Subbasins

The Port codes STIA storm drainage subbasin names according to location, for example, "SDN1" means "storm drain north number 1." The NPDES permit refers to outfalls by number; however, this report refers to subbasins and their outfalls by location names (both identifiers are used in subsequent tables). The Port also identifies manhole or other specific locations within a particular subbasin according to an alphanumeric scheme. Figure 1 shows the stormwater drainage subbasins.

Two of the subbasins with discharges tested for WET, SDS3 and SDN4 comprise 51% of the total STIA storm drainage area. These two subbasins drain the majority of the airfield runways, taxiways and aircraft "hardstand" areas that make up the airfield operations area (AOA). In contrast, the other two subbasins with discharges WET-tested, SDE4 and SDN1 drain the "landside" areas and comprise 17% of the SDS. These landside areas are mostly associated with passenger vehicles, including public roads such as the airport access freeway, Air Cargo Road and portions of International Boulevard.

Recent Annual Stormwater Monitoring reports showed that the concentrations of metals and other constituents were lower in airfield outfall samples when compared to results from the landside subbasin outfalls (POS, 1996, 1997.) In the past few years, the Port has constructed a number of source-control best management practices (BMPs) that reroute storm drainage to the IWS for a number of airfield and landside areas, including an entire SDS subbasin (SDN2).



LEGEND

○	MANHOLE
□	CATCH BASIN
—	CLEANOUT
—	STORM WATER CONVEYANCE
→	DIRECTION OF FLOW
○	PERFORATED PIPE
○	STRUCTURE IDENTIFICATION
—	PROPERTY BOUNDARY
—	PORT PROPERTY
—	ACQUISITION BOUNDARY

STORMWATER DRAINAGE BASIN COLOR CODES:

SDN1	SDS1	SDW3	IWS
SDN3	SDS3	SDW4	B
SDN4	SDS4	SDW5	D
SDN5	SDS5	SDW6	SDS2
SDN6	SDS6	SDW7	SDS2
SDN7	SDS7	SDW8	SDS2
SDN8	SDS8	SDW9	SDS2
SDN9	SDS9	SDW10	SDS2
SDN10	SDS10	SDW11	SDS2
SDN11	SDS11	SDW12	SDS2
SDN12	SDS12	SDW13	SDS2
SDN13	SDS13	SDW14	SDS2
SDN14	SDS14	SDW15	SDS2
SDN15	SDS15	SDW16	SDS2
SDN16	SDS16	SDW17	SDS2
SDN17	SDS17	SDW18	SDS2
SDN18	SDS18	SDW19	SDS2
SDN19	SDS19	SDW20	SDS2
SDN20	SDS20	SDW21	SDS2
SDN21	SDS21	SDW22	SDS2
SDN22	SDS22	SDW23	SDS2
SDN23	SDS23	SDW24	SDS2
SDN24	SDS24	SDW25	SDS2
SDN25	SDS25	SDW26	SDS2
SDN26	SDS26	SDW27	SDS2
SDN27	SDS27	SDW28	SDS2
SDN28	SDS28	SDW29	SDS2
SDN29	SDS29	SDW30	SDS2
SDN30	SDS30	SDW31	SDS2
SDN31	SDS31	SDW32	SDS2
SDN32	SDS32	SDW33	SDS2
SDN33	SDS33	SDW34	SDS2
SDN34	SDS34	SDW35	SDS2
SDN35	SDS35	SDW36	SDS2
SDN36	SDS36	SDW37	SDS2
SDN37	SDS37	SDW38	SDS2
SDN38	SDS38	SDW39	SDS2
SDN39	SDS39	SDW40	SDS2
SDN40	SDS40	SDW41	SDS2
SDN41	SDS41	SDW42	SDS2
SDN42	SDS42	SDW43	SDS2
SDN43	SDS43	SDW44	SDS2
SDN44	SDS44	SDW45	SDS2
SDN45	SDS45	SDW46	SDS2
SDN46	SDS46	SDW47	SDS2
SDN47	SDS47	SDW48	SDS2
SDN48	SDS48	SDW49	SDS2
SDN49	SDS49	SDW50	SDS2
SDN50	SDS50	SDW51	SDS2
SDN51	SDS51	SDW52	SDS2
SDN52	SDS52	SDW53	SDS2
SDN53	SDS53	SDW54	SDS2
SDN54	SDS54	SDW55	SDS2
SDN55	SDS55	SDW56	SDS2
SDN56	SDS56	SDW57	SDS2
SDN57	SDS57	SDW58	SDS2
SDN58	SDS58	SDW59	SDS2
SDN59	SDS59	SDW60	SDS2
SDN60	SDS60	SDW61	SDS2
SDN61	SDS61	SDW62	SDS2
SDN62	SDS62	SDW63	SDS2
SDN63	SDS63	SDW64	SDS2
SDN64	SDS64	SDW65	SDS2
SDN65	SDS65	SDW66	SDS2
SDN66	SDS66	SDW67	SDS2
SDN67	SDS67	SDW68	SDS2
SDN68	SDS68	SDW69	SDS2
SDN69	SDS69	SDW70	SDS2
SDN70	SDS70	SDW71	SDS2
SDN71	SDS71	SDW72	SDS2
SDN72	SDS72	SDW73	SDS2
SDN73	SDS73	SDW74	SDS2
SDN74	SDS74	SDW75	SDS2
SDN75	SDS75	SDW76	SDS2
SDN76	SDS76	SDW77	SDS2
SDN77	SDS77	SDW78	SDS2
SDN78	SDS78	SDW79	SDS2
SDN79	SDS79	SDW80	SDS2
SDN80	SDS80	SDW81	SDS2
SDN81	SDS81	SDW82	SDS2
SDN82	SDS82	SDW83	SDS2
SDN83	SDS83	SDW84	SDS2
SDN84	SDS84	SDW85	SDS2
SDN85	SDS85	SDW86	SDS2
SDN86	SDS86	SDW87	SDS2
SDN87	SDS87	SDW88	SDS2
SDN88	SDS88	SDW89	SDS2
SDN89	SDS89	SDW90	SDS2
SDN90	SDS90	SDW91	SDS2
SDN91	SDS91	SDW92	SDS2
SDN92	SDS92	SDW93	SDS2
SDN93	SDS93	SDW94	SDS2
SDN94	SDS94	SDW95	SDS2
SDN95	SDS95	SDW96	SDS2
SDN96	SDS96	SDW97	SDS2
SDN97	SDS97	SDW98	SDS2
SDN98	SDS98	SDW99	SDS2
SDN99	SDS99	SDW100	SDS2

OUTFALL LOCATION ◆ **PUMPSTATION LOCATION**

SDN1	SDS1	SDW3	IWS
SDN3	SDS3	SDW4	B
SDN4	SDS4	SDW5	D
SDN5	SDS5	SDW6	SDS2
SDN6	SDS6	SDW7	SDS2
SDN7	SDS7	SDW8	SDS2
SDN8	SDS8	SDW9	SDS2
SDN9	SDS9	SDW10	SDS2
SDN10	SDS10	SDW11	SDS2
SDN11	SDS11	SDW12	SDS2
SDN12	SDS12	SDW13	SDS2
SDN13	SDS13	SDW14	SDS2
SDN14	SDS14	SDW15	SDS2
SDN15	SDS15	SDW16	SDS2
SDN16	SDS16	SDW17	SDS2
SDN17	SDS17	SDW18	SDS2
SDN18	SDS18	SDW19	SDS2
SDN19	SDS19	SDW20	SDS2
SDN20	SDS20	SDW21	SDS2
SDN21	SDS21	SDW22	SDS2
SDN22	SDS22	SDW23	SDS2
SDN23	SDS23	SDW24	SDS2
SDN24	SDS24	SDW25	SDS2
SDN25	SDS25	SDW26	SDS2
SDN26	SDS26	SDW27	SDS2
SDN27	SDS27	SDW28	SDS2
SDN28	SDS28	SDW29	SDS2
SDN29	SDS29	SDW30	SDS2
SDN30	SDS30	SDW31	SDS2
SDN31	SDS31	SDW32	SDS2
SDN32	SDS32	SDW33	SDS2
SDN33	SDS33	SDW34	SDS2
SDN34	SDS34	SDW35	SDS2
SDN35	SDS35	SDW36	SDS2
SDN36	SDS36	SDW37	SDS2
SDN37	SDS37	SDW38	SDS2
SDN38	SDS38	SDW39	SDS2
SDN39	SDS39	SDW40	SDS2
SDN40	SDS40	SDW41	SDS2
SDN41	SDS41	SDW42	SDS2
SDN42	SDS42	SDW43	SDS2
SDN43	SDS43	SDW44	SDS2
SDN44	SDS44	SDW45	SDS2
SDN45	SDS45	SDW46	SDS2
SDN46	SDS46	SDW47	SDS2
SDN47	SDS47	SDW48	SDS2
SDN48	SDS48	SDW49	SDS2
SDN49	SDS49	SDW50	SDS2
SDN50	SDS50	SDW51	SDS2
SDN51	SDS51	SDW52	SDS2
SDN52	SDS52	SDW53	SDS2
SDN53	SDS53	SDW54	SDS2
SDN54	SDS54	SDW55	SDS2
SDN55	SDS55	SDW56	SDS2
SDN56	SDS56	SDW57	SDS2
SDN57	SDS57	SDW58	SDS2
SDN58	SDS58	SDW59	SDS2
SDN59	SDS59	SDW60	SDS2
SDN60	SDS60	SDW61	SDS2
SDN61	SDS61	SDW62	SDS2
SDN62	SDS62	SDW63	SDS2
SDN63	SDS63	SDW64	SDS2
SDN64	SDS64	SDW65	SDS2
SDN65	SDS65	SDW66	SDS2
SDN66	SDS66	SDW67	SDS2
SDN67	SDS67	SDW68	SDS2
SDN68	SDS68	SDW69	SDS2
SDN69	SDS69	SDW70	SDS2
SDN70	SDS70	SDW71	SDS2
SDN71	SDS71	SDW72	SDS2
SDN72	SDS72	SDW73	SDS2
SDN73	SDS73	SDW74	SDS2
SDN74	SDS74	SDW75	SDS2
SDN75	SDS75	SDW76	SDS2
SDN76	SDS76	SDW77	SDS2
SDN77	SDS77	SDW78	SDS2
SDN78	SDS78	SDW79	SDS2
SDN79	SDS79	SDW80	SDS2
SDN80	SDS80	SDW81	SDS2
SDN81	SDS81	SDW82	SDS2
SDN82	SDS82	SDW83	SDS2
SDN83	SDS83	SDW84	SDS2
SDN84	SDS84	SDW85	SDS2
SDN85	SDS85	SDW86	SDS2
SDN86	SDS86	SDW87	SDS2
SDN87	SDS87	SDW88	SDS2
SDN88	SDS88	SDW89	SDS2
SDN89	SDS89	SDW90	SDS2
SDN90	SDS90	SDW91	SDS2
SDN91	SDS91	SDW92	SDS2
SDN92	SDS92	SDW93	SDS2
SDN93	SDS93	SDW94	SDS2
SDN94	SDS94	SDW95	SDS2
SDN95	SDS95	SDW96	SDS2
SDN96	SDS96	SDW97	SDS2
SDN97	SDS97	SDW98	SDS2
SDN98	SDS98	SDW99	SDS2
SDN99	SDS99	SDW100	SDS2

3 RESULTS AND DISCUSSION

3.1 General results

Results of the WET tests performed on stormwater samples from outfalls SDE4, SDS3, and SDN4 met Ecology's WET testing performance standards⁴. However, results from outfall SDN1 exhibited aquatic toxicity that was subsequently traced to metals leaching from uncoated galvanized sheet metal rooftops. According to the manufacturer's literature, the coating on this common sheet-steel roofing product contains 43% zinc by weight (Bethlehem Steel, 1995.) Because the WET test results from outfalls SDS3 and SDN4 demonstrated no toxicity, sampling requirements for these two outfalls were completed early in the program during the fall and winter months of 1998-1999. All test results for these 2 outfalls met Ecology's performance standards for individual results so that additional testing was not necessary. Outfalls SDE4 and SDN1 were sampled during additional storms to corroborate results from the first two tests. For SDE4, the additional sampling and WET testing met the required standards. As a result, further testing was not necessary. Of the five samples evaluated for WET for outfall SDE4, the average survival of 96% for the daphnid and 85.8% for the fathead minnow met the Ecology performance standards. However, samples collected from SDN1 continued to exhibit toxicity. As a result, the Port engaged in the SDN1 source-tracing study described below.

Table 1 summarizes WET testing results and lists the relative percent rank for each supplemental analytical result (metals, TSS, etc.). Though not required to do so, the Port analyzed these additional chemical-specific parameters to characterize the WET test samples and compare results with the 5-year data history for each outfall. Because the results were within the ranges of the historical data for each outfall, the WET test samples are considered to be comparable to other historical samples. Appendix A lists the individual sample results and ranks. Table 2 lists the other WET metrics reported: NOEC, LOEC and LC50.

⁴ According to WAC 173-205, for acute WET tests the average survival in 100% effluent must be at least 80%, and no single sample must have less than 65% survival. For outfall SDE4, one of ten test results exhibited 63% survival, just below the minimum performance standard of 65% survival for a single test.

Table 1 WET Testing Summary

Outfall (#)	Sample date	WET, % survival		note
		daphnid	fathead	
SDE4 (002)	11/19/98	90	100	
	1/21/99	100	98	2
	2/23/99	95	██████████	3
	3/24/99	95	98	3
	7/2/99	100	70	3,4
	<i>Average</i>		<i>96</i>	<i>85.8</i>
SDS3 (005)	11/13/98	90	98	
	1/14/99	80	95	
	<i>Average</i>	<i>85</i>	<i>96.5</i>	
SDN1 (006)	11/13/98	80	██████████	
	1/14/99	██████████	78	
	3/24/99	██████████	██████████	3
	5/11/99	██████████	not tested	3,6
	7/2/99	not tested	██████████	3,4,5
	11/6/99	██████████	not tested	3,6
	<i>Average</i>	<i>37</i>	<i>53.5</i>	
SDN4 (007)	11/13/98	75	100	
	1/14/99	100	100	
	<i>Average</i>	<i>87.5</i>	<i>100</i>	

Shaded values indicate the individual result was below the performance standard of 65% survival.

Notes for Table:

1. all samples were flow-weighted composite stormwater samples
2. SDE4 Jan 20, 1999 sample: fathead test duration was 48-hr instead of 96-hr
3. Retested to corroborate previous results.
4. July 2, 1999 samples: fathead control survival of 72.5% was below the performance standard of >90%.
5. July 2, 1999 SDN1 sample: insufficient # of organisms to start daphnid test.
6. Sample taken for source-tracing

Table 2 Additional WET Test Metrics

Outfall	Sample Date	Test Date	Species	Duration	NOEC	LOEC	LC50	% Survival in 100% Sample
SDN1 (006)	11/13/98	11/13/98	<i>D. pulex</i>	48 hours	100%	>100%	>100%	80%
	1/14/99	1/15/99	<i>D. pulex</i>	48 hours	100%	>100%	85.20%	30%
	3/24/99	3/25/99	<i>D. pulex</i>	48 hours	50%	100%	74.00%	10%
	7/2/99	7/3/99	<i>D. pulex</i>	not tested				
	11/13/98	11/13/98	<i>P. promelas</i>	96 hours	50%	100%	89%	40%
	1/14/99	1/15/99	<i>P. promelas</i>	96 hours	100%	>100%	>100%	78%
	3/24/99	3/25/99	<i>P. promelas</i>	96 hours	50%	100%	>100%	63%
	7/2/99	7/3/99	<i>P. promelas</i>	96 hours	50%	100%	88%	33%
SDN4 (011)	11/13/98	11/13/98	<i>D. pulex</i>	48 hours	100%	>100%	>100%	75%
	1/14/99	1/15/99	<i>D. pulex</i>	48 hours	100%	>100%	>100%	100%
	11/13/98	11/13/98	<i>P. promelas</i>	96 hours	100%	>100%	>100%	100%
	1/14/99	1/15/99	<i>P. promelas</i>	96 hours	100%	>100%	>100%	100%
SDS3 (005)	11/13/98	11/13/98	<i>D. pulex</i>	48 hours	100%	>100%	>100%	90%
	1/14/99	1/15/99	<i>D. pulex</i>	48 hours	100%	>100%	>100%	80%
	11/13/98	11/13/98	<i>P. promelas</i>	96 hours	100%	>100%	>100%	98%
	1/14/99	1/15/99	<i>P. promelas</i>	96 hours	100%	>100%	>100%	95%
SDE4 (002)	11/19/98	11/20/98	<i>D. pulex</i>	48 hours	100%	>100%	>100%	90%
	1/21/99	1/22/99	<i>D. pulex</i>	48 hours	100%	>100%	>100%	100%
	2/23/99	2/23/99	<i>D. pulex</i>	48 hours	100%	>100%	>100%	95%
	3/24/99	3/25/99	<i>D. pulex</i>	48 hours	100%	>100%	>100%	95%
	7/2/99	7/3/00	<i>D. pulex</i>	48 hours	100%	>100%	>100%	100%
	11/19/98	11/20/98	<i>P. promelas</i>	96 hours	100%	>100%	>100%	100%
	1/21/99	1/22/99	<i>P. promelas</i>	48 hours	100%	>100%	>100%	98%
	2/23/99	2/23/99	<i>P. promelas</i>	96 hours	25%	50%	>100%	63%
	3/24/99	3/25/99	<i>P. promelas</i>	96 hours	100%	>100%	>100%	98%
	7/2/99	7/3/99	<i>P. promelas</i>	96 hours	100%	>100%	>100%	70%*

* in this test, survival in the control of 72.5% did not meet minimum acceptability criterion of 90%

3.2 SDN1 source-tracing

Additional stormwater samples collected from outfall SDN1 continued to exhibit toxicity.. To address this, the Port developed a multiphase source-tracing study using additional stormwater sampling and testing. The approach used concurrent WET testing and chemical-specific analysis of stormwater samples to reveal clues about specific sources of toxicity. Because the first three samples showed that the daphnia were more sensitive, source-tracing samples were tested using only *Daphnia pulex* in 100% sample concentration.

Because stormwater from SDN1 has historically exhibited higher zinc concentrations than other outfalls (see Figure 2), this metal was suspected as a potential source of toxicity. Note the considerable number of historical samples (twenty for SDN1) denoted by "N=" below each boxplot in the figure. Based on this information, this additional effort focused on metals and used a chelation technique to determine if particular metals were responsible for any toxicity observed in these subsequent WET tests⁵. During these additional sampling events in SDN1, upstream source area runoff samples were also tested to determine where and under what conditions the problems occurred. These potential source areas upstream of the SDN1 sampling location isolate runoff from the TransiPLEX rooftops (a total of 4 buildings), AFCO cargo building rooftops (2 buildings), and Air Cargo Road (which also contains runoff from the recently constructed east expansion of the FedEx building rooftop.)

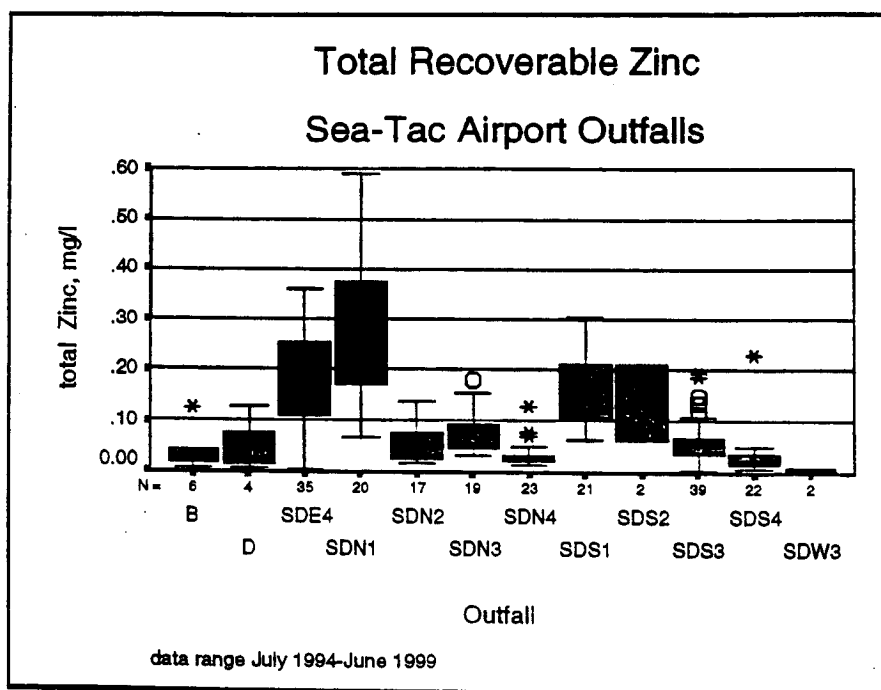


Figure 2 Boxplot of Zinc in STIA Stormwater Samples

⁵ Chelation is the chemical process whereby ions, free metals in this case, are rendered non-bioavailable by binding to a host molecule that forms a stable complex. Free metal ions that are "bioavailable" are the form generally considered to be responsible for toxicity to aquatic organisms.

3.2.1 Summary of source-tracing results

Initial source-tracing and metals chelation confirmed that zinc was the principal, if not sole toxicant present. Total recoverable (TR) zinc concentrations ranged from 120 to 487 µg/l which were within the 11th to 78th percentiles of historical data for SDN1. In four composite samples tested, dissolved zinc ranged from 33 to 117 µg/l, and comprised 18 to 58% of the total zinc. These SDN1 samples generally had higher dissolved zinc than samples from the other outfalls subject to WET testing where dissolved zinc ranged from 12 to 49 µg/l (see Appendix A.) The discussions below focus on metals, because in general other constituents were not associated with survival. Appendix C summarizes the source tracing sample results.

Treating the SDN1 samples with chelating agents that bind dissolved metals confirmed that metals were the principal source of toxicity, with specific indications for zinc. Samples taken from SDN1 drainage isolated from specific rooftops and other contributory areas indicated that the zinc was primarily associated with uncoated galvanized rooftops of the AFCO cargo buildings, but not the nearby non-metal rooftops of the five nearby Transiplex buildings. Synthetic storm runoff samples obtained after spraying domestic water on the AFCO rooftops showed zinc concentrations and toxicity similar to the actual storm samples. The domestic water was not toxic and had about 15 times less zinc than the synthetic runoff sample. These results indicated that the AFCO rooftops were the principal source of zinc. However, other, less significant sources may exist in the SDN1 subbasin. Once the primary source of toxicity (AFCO rooftops) is eliminated, additional sampling should be performed to determine the effectiveness of the solution. If SDN1 discharges continue to fall below the WET performance standards, additional sampling and source tracing should be undertaken.

The following sections provide details on the sampling, analysis and results of the source tracing as well as a discussion of the potential sources of toxicity.

3.2.2 Field Investigations

Plans and field investigations verified that only reinforced concrete pipe (RCP) and plastic (PVC) piping is used in the SDN1 drainage area studied. None of this drainage passed through corrugated metal pipe (CMP), a potential source of zinc due to galvanized coatings. Also, unlike the other subbasins evaluated for WET, drainage maps and field conditions show that SDN1 runoff receives little to no contact with vegetation and soils; runoff flows directly from the impervious surfaces into the constructed drainage system. Appendix B contains photographs showing the general layout of the SDN1 area under study.

AFCO Cargo Buildings and Their Drainage

Building plans indicated that the two AFCO buildings were constructed about 1989. The plans⁶ called for roofing material using uncoated galvanized sheet-steel roofing (POS 1990, Bethlehem Steel, 1995.) Field reconnaissance verified that indeed the roofing material on AFCO building #2 was galvanized and uncoated. According to STIA drainage maps the total roof area is about 2.2 acres, which is similar to the building plans. Because both buildings were designed and built as part of the same project, the as-built conditions of the roofing material on AFCO building #2 are assumed to be the same as that on building #1.

These rooftops represent 25% of the total SDN1 area draining to manhole SDN1-41, the current subbasin SDN1 sampling station for NPDES permit compliance (see Figure 3 and Figure 4.) Other field inspections verified that drainage from these rooftops was the principal discharge present in the 10 inch RCP inlet to manhole SDN1-41 from SDN1-34. The rooftop is in good condition, and has about eight small ventilation stacks, a single air conditioning unit, and no other equipment installed. See the photographs in Appendix B.

⁶ STIA drawing 9029 indicates that the building fabricator was Ruffin Pre-Fab, Inc., of Oak Grove, LA. During a telephone call to this company, a Ruffin employee indicated his familiarity with the AFCO building (previously known as "Avia") project and supplied the material specification cited above.

Other minor amounts of runoff from an area of about 500 square feet of pavement along the East side of this building at loading dock numbers E9 to E13 (see Appendix B) also combines with the AFCO Air Cargo building rooftop drainage. To prevent this drainage from influencing the subsequent samples taken in this study, the outlet of the trench drain that receives this runoff was blocked beginning in June 1999. Ponding due to this blockage did not occur because the affected runoff flows immediately to the adjacent trench drain along loading docks E7 to E9. This second trench drain connects to the IWS, unlike the former which should be considered for a drainage reroute from SDN1 to the IWS. These drainage connections were verified during dry-weather flow and/or dye testing in March 1999.

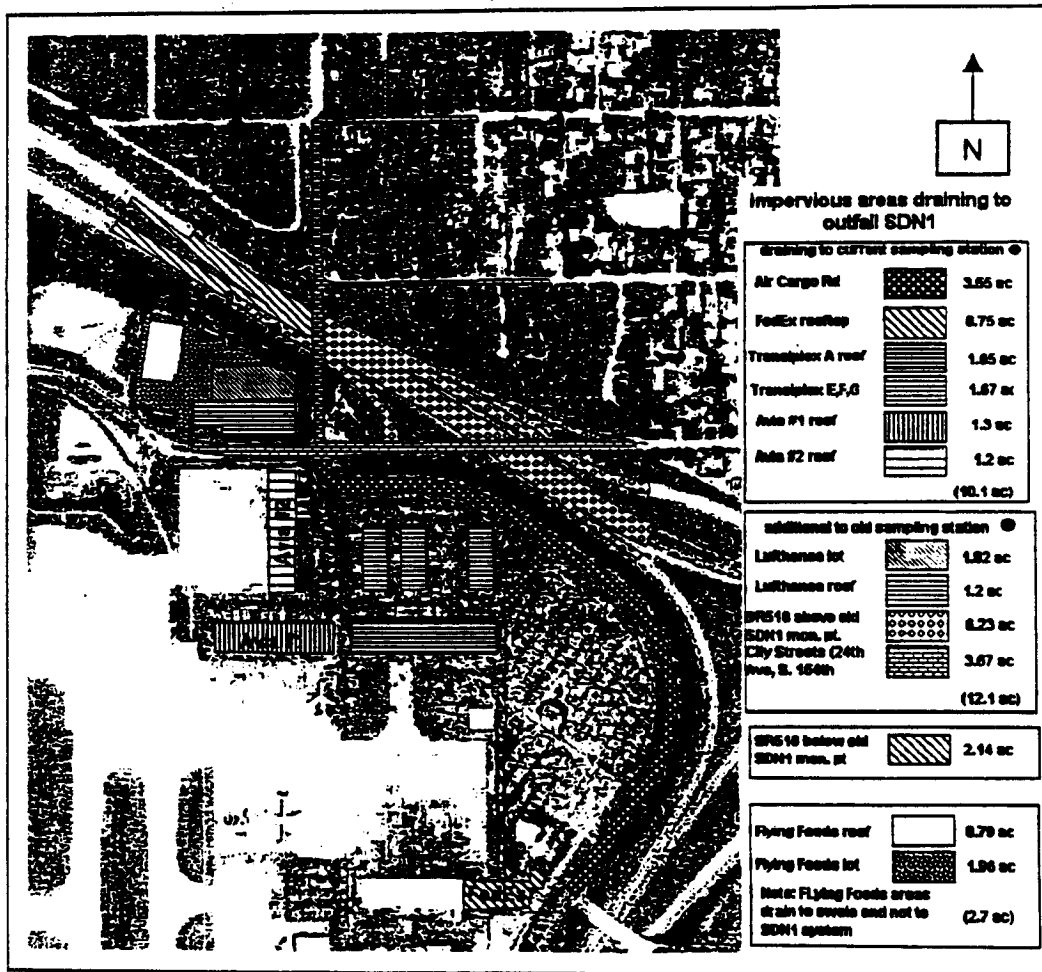


Figure 3 SDN1 Subbasin Map

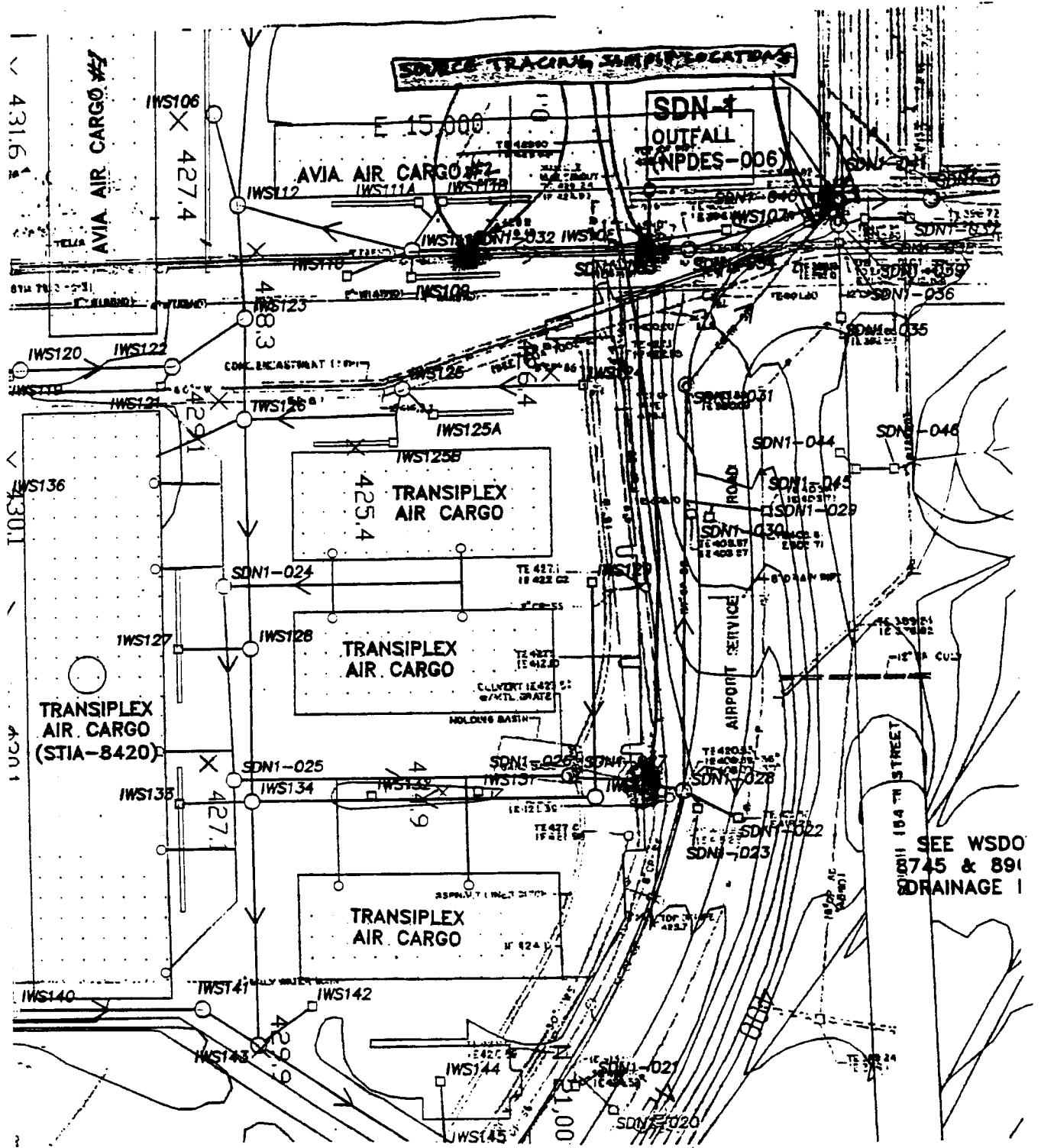


Figure 4 SDN1 Source Tracing Sampling Locations
(SDN1 piping shown in blue)

3.2.3 Sampling Locations

Samples were collected primarily in the three pipes in manhole SDN1-41 that aggregate drainage from various source areas. Grab samples were also taken at other manholes further upstream in the system to isolate drainage from specific source areas and determine their relative metals concentrations. These locations are summarized below and shown in Figure 3 and Figure 4.

1. SDN1-41 manhole: 36" RCP outlet to SDN1-042:
 - This is the routine NPDES compliance sampling location for SDN1 that aggregates all upstream POS drainage. Initial indications of toxicity were found here.
2. SDN1-41 manhole: 36" RCP inlet from SDN1-31
 - This pipe aggregates drainage from Air Cargo Road, and the Transiplex and FedEx rooftops, called "road aggregate" below (labeled "41-31" in Appendix C)
3. SDN1-41 manhole: 10" RCP inlet from SDN1-34
 - This pipe aggregates drainage from locations 5, 6, and 7 below (the two AFCO cargo buildings and the loading dock mentioned below (labeled "41-34" in Appendix C))
4. SDN1-27 manhole: 24" RCP inlet from SDN1-26
 - This location isolates drainage from the four Transiplex buildings A, E,F and G rooftops (about 3.3 acres of rooftops)
5. SDN1-32 manhole: 6" PVC inlet about 3 feet below the manhole rim (not shown on Figure 4)
 - This location isolates drainage from the loading dock trench drain along the east side of AFCO building #2 (about 500 square feet of pavement)
6. SDN1-32 manhole: 10" RCP inlet from the south, bottom of structure
 - This location isolates drainage from AFCO building #1 rooftop only
7. SDN1-33 manhole: 6" PVC inlet about 3 feet below the manhole rim
 - This location isolates drainage from AFCO building #2 rooftop only

3.2.4 Initial Screening Samples

To determine the relative concentrations of metals originating from the various source areas, grab samples were collected during an initial screening of runoff the seven locations listed above. Note that locations 2 and 3 aggregate runoff from the multiple source areas upstream of the sampling location where toxicity was indicated during the initial WET testing. Three storm events were sampled in early 1999: January 13 (1.07"), March 8 (0.28") and March 24 (0.28"). During the first and last of these three storms, grab samples were taken during the rising and falling limbs of the runoff event to determine the relative degree of temporal variation. Appendix C contains the sample results that are plotted in Figure 5 and Figure 6 below. For relative comparisons, these figures show historical interquartile ranges (dashed lines for the 25th and 75th percentile) for SDE4, a comparable landside subbasin with considerable roadway and rooftop drainage, but one that did not exhibit WET toxicity. Working left to right in the figures, the results indicate the following⁷.

1. Concentrations of copper and zinc in TransiPLEX rooftop runoff samples showed:
 - consistently lower concentrations than other locations sampled,
 - dissolved zinc generally an order of magnitude below results from the other rooftops,
 - little difference between samples taken at different times during the discharge (denoted by a sequence number after the sample date),
 - little difference among all samples from the three storm events, and
 - results less than the interquartile range from landside outfall SDE4.
2. Runoff from the loading dock trench drain generally had higher copper and zinc than the other source areas tested, and was higher than the median for SDE4.
3. Comparing samples of runoff isolated from each of the two AFCO building rooftops indicates:
 - copper and zinc were similar between the two buildings among the different events,

⁷ Because dissolved lead was generally less than detection limits, it is not shown in the figures.

- the second sample of the March 24, 1999 event had more than double the zinc of the earlier sample, and
 - despite the presence of the minor runoff from the loading dock trench drain, metals in the aggregate runoff of both AFCO rooftops ("AFCO roofs") were similar to and approximated an average of the samples of runoff isolated from each rooftop ("AFCO #1, AFCO #2".)
4. Comparing the Road and AFCO roofs aggregate samples, results indicate:
- TR copper was similar and within or below the interquartile range for SDE4,
 - in the Road aggregate samples, TR zinc was within the interquartile range for SDE4, and varied less than the rooftop samples
 - in the AFCO rooftop runoff, TR zinc varied to a greater degree than the road aggregate samples. Two rooftop samples had considerably higher TR zinc than the road samples and exceeded the SDE4 interquartile range.
5. In general, metals were mostly present in the dissolved form in all samples. Dissolved to total recoverable metals ratios for copper and zinc ranged from 0.21 to 0.91, with an average of about 61% dissolved. Total recoverable zinc results from the AFCO building rooftops during the March 24, 1999 event ranged from 66 to 92% dissolved.
6. Overall, hardness was low in all samples, which is not surprising given that the runoff has little to no contact with soil surfaces. In general, lower hardness causes metals to be more toxic at lower concentrations.

Based on these initial findings of the source tracing study, the ensuing work incorporated the following considerations:

- it was unlikely that the Transi-plex rooftops contributed toxic concentrations of metals,
- the loading dock trench drain was blocked to exclude this drainage from mixing with the AFCO rooftop drainage during the next source-tracing steps. A permanent BMP should be instituted to remove this drainage from SDN1 as part of the SWPPP (POS 1998), and

- subsequent WET testing and chelation evaluations in this project focused on samples from three locations in manhole SDN1-41: 1) the 10" RCP Inlet that aggregates the AFCO rooftop runoff, 2) the 36" RCP inlet that aggregates runoff from Air Cargo Road, and the Transiplex and the FedEx rooftops, and 3) the 36" RCP outlet because it is the NPDES compliance sampling location. Samples taken at this outlet measure the net effect of the combined runoff from the two inlets.

3.2.5 Subsequent WET Testing and Chelation Results

Later in 1999, flow-weighted composite samples were collected from the three pipes (two inlets, one outlet) in manhole SDN1-41 during three storm events and analyzed for WET and specific chemical constituents. Two of these sets of samples were processed using chelation to determine if and to what extent metals were associated with toxicity. Samples of runoff produced by spraying the rooftops with domestic water were also tested for WET and the chelation associations.

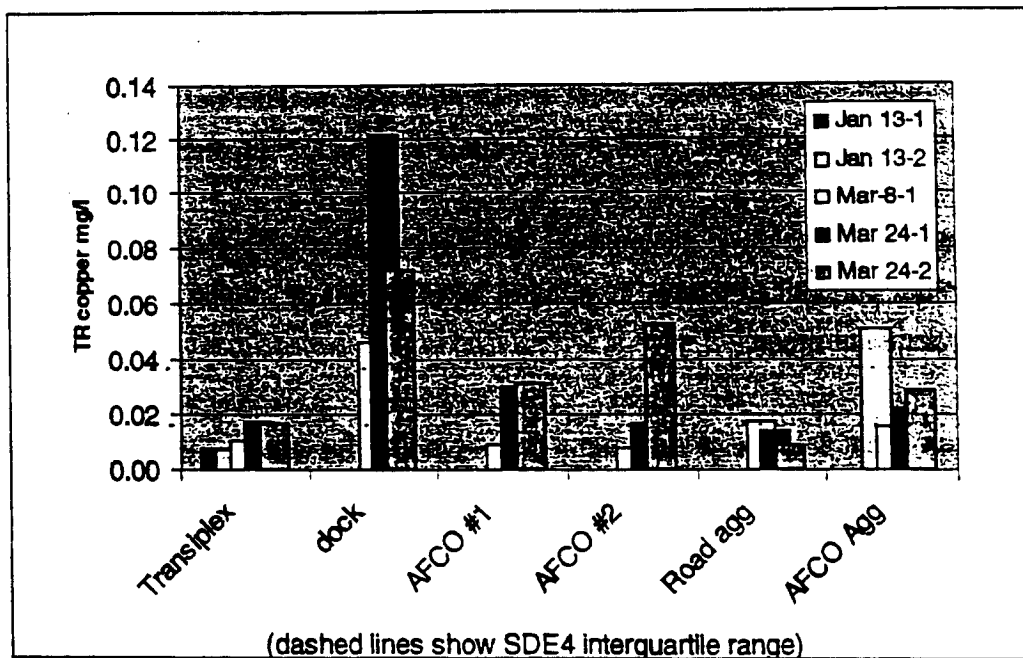


Figure 5 Copper in Initial Screening Grab Samples

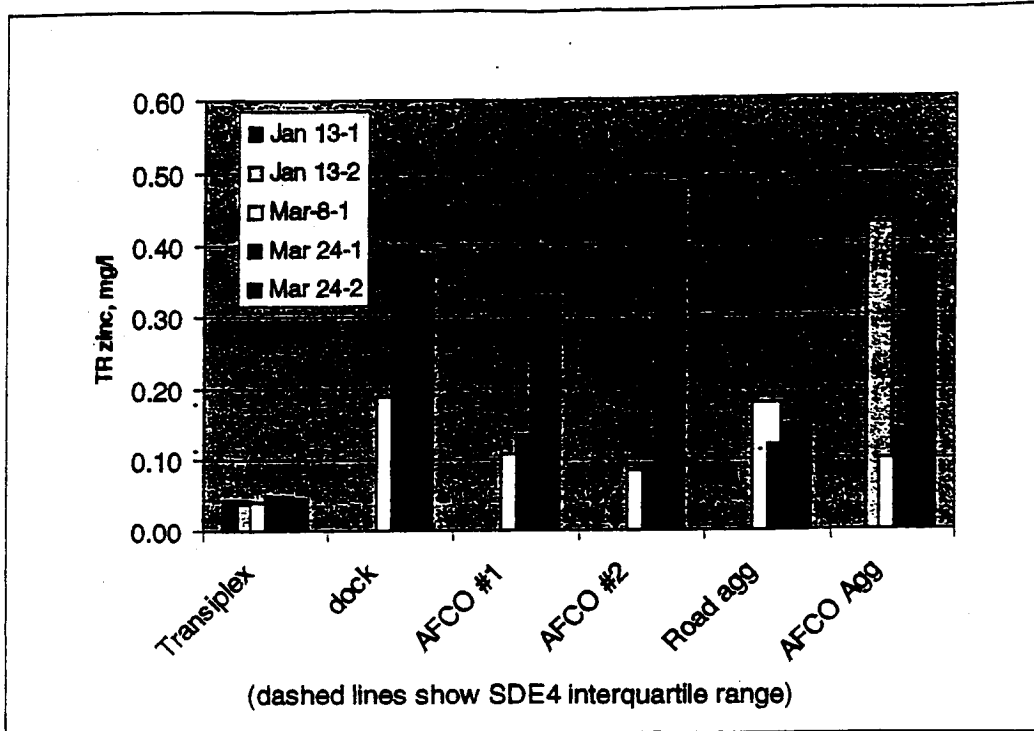


Figure 6 Zinc in Initial Screening Grab Samples

Chelation testing results

Chelation testing on the stormwater yielded interesting and meaningful results. After reducing the bioavailability of metals using two different chelating agents, test organisms had higher survival rates. Therefore, metals were confirmed as the source of toxicity. Furthermore, based on the methods of Hockett and Mount (1996), the pattern of toxicity reduction following chelation confirmed that zinc⁸ was indeed the most likely source of toxicity. These tests use EDTA (ethylenediaminetetraacetic acid) and sodium thiosulphate (STS) as chelating agents. Comparing bioassay results before and after adding these agents indicates if and to what degree metals influence toxicity. According to the matrix developed for this method, strong

⁸ Hockett and Mount's approach also suggests lead or nickel as potential toxicants, however, historic concentrations of lead and nickel in SDN1 samples were below levels that might have caused toxicity. Lead concentrations analyzed in samples taken during this study were similarly low, and generally not detected. Therefore, this approach indicated zinc as the principal metal attributable for toxicity.

toxicity removal by EDTA coupled with weak removal by STS indicates zinc as a likely source (see Appendix D.)

Other parameters analyzed, such as surfactants and ammonia were not correlated with survival. For samples with low pH, adjusting pH to within acceptable ranges produced little to no toxicity reduction. Survival in laboratory blanks was unaffected by the chelation testing. Table 3 summarizes test results documented by Parametrix, Incorporated (1999f,g,h) with details described below.

In the May 11, 1999 samples, survival was 5% in the SDN1 sample. Subsequent chelation with EDTA dramatically improved survival to 85 to 100%. Because there was limited improvement in survival after the STS additions, results suggest zinc as the source of toxicity. In other words, there were little to no toxic effects due to bioavailable forms of other metals, such as copper, that tend to bind with the STS. In both the road and AFCO rooftop aggregate samples survival was zero, indicating sources of toxicity in drainage from each of these source areas. Because chelation testing was not performed on samples from these source areas, the origins of metals and associated toxicity in the SDN1 sample during this event are not clear. It is important to note that this storm was relatively small (0.14") and that composite samples taken during this event would not meet the minimum rainfall depth criteria (0.20") for NPDES reporting (POS, 1999b.)

Because of problems associated with the WET testing for the July 2, 1999 event, chelation was not pursued⁹. However, the metals results were still valid. There were few other suitable storms for sampling until early fall 1999.

The November 6, 1999 samples tested were from a more typical storm of 0.68 inches. The SDN1 sample and AFCO roof sample each showed a strong improvement in survival after treatment with EDTA. In contrast, the STS additions yielded little to no improvements in

⁹ In the July 2, 1999 WET samples, there was an insufficient number of organisms to start the daphnid test. Also, the fathead minnow survival of 72.5% in the control was below the acceptability criterion of $\geq 90\%$ for control survival.

survival for these two samples. The sample of aggregate runoff from Air Cargo road, and the Transiplex and FedEx rooftops behaved similarly, though initial survival was higher (70%) and chelation results less dramatic. Note that this particular sample would have passed the Ecology performance standards for WET testing. Nonetheless, the chelation results indicate a mild degree of toxicity associated with metals in this aggregate sample of road and other rooftop runoff, predominantly zinc, and possibly copper. Total recoverable zinc was similar between the roads and AFCO runoff samples, yet, the dissolved fraction in the roof sample (0.097 mg/l) was nearly twice as high the road sample (0.056 mg/l.) Copper concentrations were near or below levels suspected to cause toxicity (less than 0.010 mg/l.)

Synthetic runoff

Samples of synthetic runoff produced by spraying the rooftop of the AFCO #2 building also exhibited toxicity, while the source water did not. See Table 4. Two sets of screening tests were conducted on 100% roof runoff sample, the domestic source water, and a control. The domestic source water used for this test was sampled at the outlet of the hose on the tank truck used in the test. The rooftop area tested was well away from the single air-conditioning unit, a potential source of metals associated with exposed cooling coils. Because sample values fell within acceptable test ranges, no pH adjustments were necessary prior to WET testing these samples.

Copper and zinc were generally 2 orders of magnitude higher in the synthetic runoff than the domestic water. Dissolved copper and zinc fractions were 58% and 52% of the total metals measured in the roof runoff. Lead was not detected in either the roof runoff or source water samples. The source water showed non-detectable copper, lead and dissolved zinc. Total recoverable zinc was about 16 times greater in the roof runoff than in the source water. Therefore, these samples show that the roofing material readily leaches metals, particularly zinc. And because about half the total zinc was dissolved in this test, the results indicate that the AFCO roofing generated some degree of metals in particulate form. It is unlikely that this particulate fraction was due to atmospheric deposition considering that runoff samples from

nearby rooftops of different construction (the four Transiplex building rooftops' material is a non-metal, single-ply membrane) had much lower metals, especially zinc (see Figures 5 and 6).

Metals Sources Indicated

The WET testing and chelation point to the AFCO Air Cargo building rooftops as at least one distinct source of toxicity with zinc as the likely toxicant. The chemical-specific results indicate that zinc is associated with the building materials, namely the uncoated galvanized metal steel roofing. Other tests have shown that dissolved zinc is higher in this roof runoff than for other locations. Because of the limited number of samples, inconsistent toxicity responses and indications after chelation, it is not clear whether the aggregate runoff from Air Cargo Road, and the Transiplex and FedEx rooftops is problematic, yet a limited degree of toxicity associated with metals is suggested. Recent reconnaissance found the FedEx cargo building rooftop materials to also be uncoated, galvanized metal similar to the AFCO rooftops. This eastern portion of the FedEx facility was added in 1997 and drains to SDN1, unlike the existing western portion that drains to the IWS. However, corrective actions for the AFCO metal roof runoff situation should be pursued as a first step as it appears to be the more significant source of toxicity due to zinc. The Port has already initiated discussions with AFCO and the roofing material manufacturer to determine alternatives for correcting the situation. If subsequent verification WET testing of SDN1 runoff yields acceptable test results no other actions would be indicated.

Table 3 Chelation Testing Results

Date	Station	pH	Percent survival							
			pH unadjusted	pH adjusted	EDTA addition			STS addition		
					0.5 mg/l	3 mg/l	8 mg/l	1 mg/l	5 mg/l	10 mg/l
5/11/99	SDN1	7.1	5%	NA	85%	100%	100%	0%	40%	15%
5/11/99	Road agg	6.1	0%	0%	NA	NA	NA	NA	NA	NA
5/11/99	AFCO Roofs	5.4	0%	25%	NA	NA	NA	NA	NA	NA
5/11/99	Blanks	8.3	100%	NA	100%	100%	100%	100%	100%	95%
11/6/99	SDN1	6.7	60%	NA	95%	90%	90%	65%	60%	75%
11/6/99	Road agg	6.8	70%	NA	100%	100%	85%	90%	70%	60%
11/6/99	AFCO Roofs	4.9	0%	0%	5%	0%	55%	0%	0%	0%
11/6/99	Control	7.5	100%	NA	NA	NA	NA	NA	NA	NA

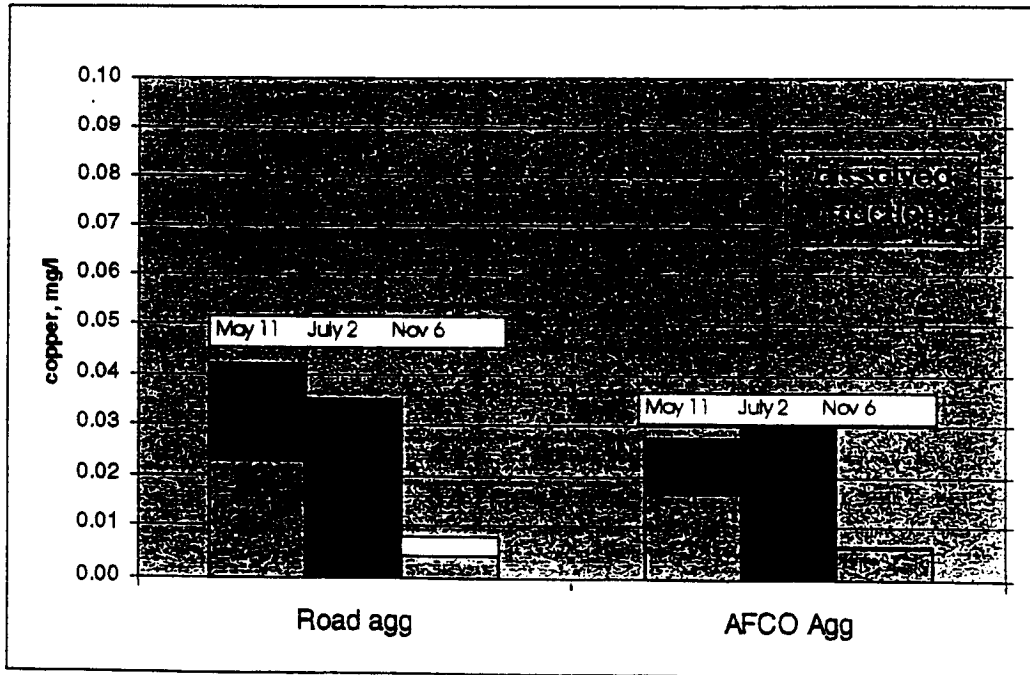


Figure 7 Copper in composite Samples

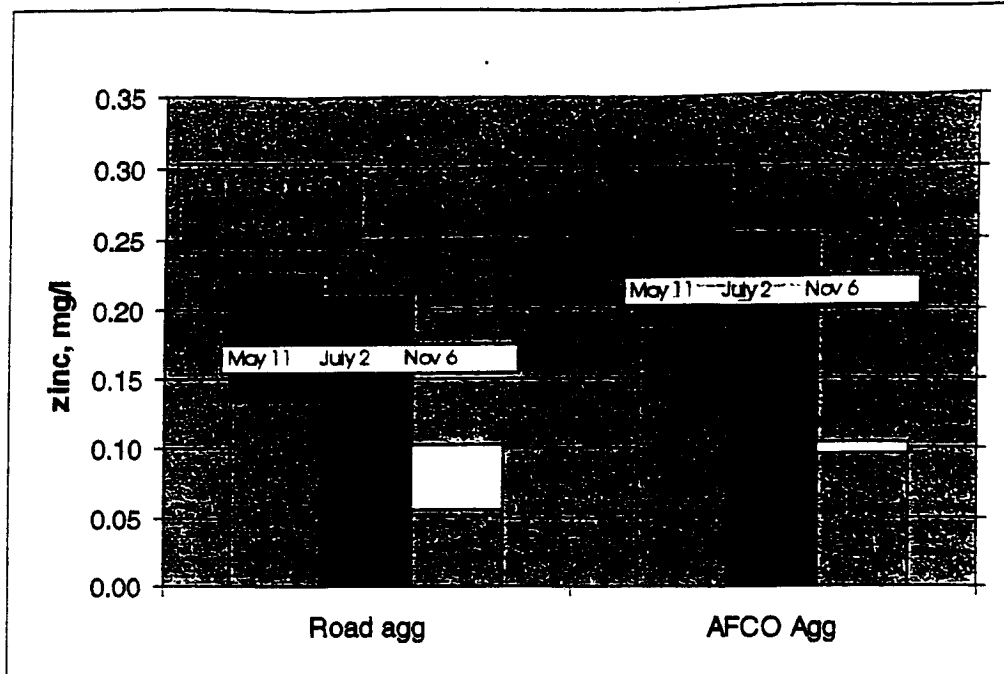


Figure 8 Zinc in composite samples

Table 4 Synthetic Runoff WET Test Results

Sample	pH	Percent Survival
<i>Test 1</i>		
Control	8.0	95%
Roof runoff	6.7	0%
Source water	6.7	90%
<i>Test 2</i>		
Control	7.8	100%
Roof runoff	6.8	0%
Source Water	6.8	100%

Table 5 Synthetic Runoff Metals Concentrations (mg/l)

Sample	TR Cu	Diss Cu	TR Pb	Diss Pb	TR Zn	Diss Zn	hardness
Roof runoff	0.034	0.023	<0.002	<0.002	0.286	0.148	27.4
Source water	<0.002	<0.002	<0.002	<0.002	0.018	<0.005	23.8

4 CONCLUSIONS

The samples collected and tested to satisfy the NPDES permit condition for WET testing support the following conclusions.

1. No further WET testing is necessary for outfalls SDS3 (005) and SDN4 (011) because samples of these stormwater discharges met Ecology's WET testing performance standards.
2. No further WET testing is necessary for outfall SDE4 (002) because the repeat testing (2 samples) met performance standards and did not indicate a continuation of the slightly below-standard survival for only the fathead minnow observed in the February 1999 sample.
3. The source tracing of problematic WET test results for SDN1 yielded meaningful results indicating the need for BMP actions. Specifically, this source-tracing showed that:
 - toxicity was caused by metals, principally zinc, that originated from uncoated galvanized metal roofing on two cargo buildings (AFCO Air Cargo),
 - runoff samples from the other major cargo building rooftops in the area that had non-metal roofing material (Transiplex) had much lower metals that are not suspected to cause toxicity, and
 - there may be other, less significant sources of runoff toxicity in the SDN1 subbasin that may warrant further investigation if corrective actions for the AFCO Air Cargo rooftop do not result in SDN1 discharges that meet performance standards.

Based on the findings of the source-tracing study for SDN1, the following recommendations should be considered.

1. Mitigate the runoff from the 2 AFCO Air Cargo building rooftops. Alternatives include coating, sealing, or removing and replacing the galvanized roofing material. Treating the runoff to remove metals may not be cost effective over the long term. Rerouting the rooftop drainage to the IWS is not consistent with IWS management strategies. Note that the AFCO buildings are tenant-owned facilities not operated by the Port of Seattle.
2. Follow up after mitigating the AFCO rooftop runoff by evaluating SDN1 stormwater for WET. Investigate the other potential sources if these follow-up results are unfavorable.

3. Prevent future use of uncoated galvanized roofing without coating, or require material leaching tests.
4. Correct the inappropriate connection of the trench drain near AFCO building #2 loading docks E9-E11.
5. Update drainage maps to include the roof and trench drain connections found in the study.

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6 APPENDICES

6.1 Appendix A WET Testing Data Summary

1998-99 WET Testing Sample Data

SDE4	sample type	storm characteristics				concentration, mg/l												WET, % survival		Comment							
		depth	rep	rain	dur	pH	TSS	Turb	BOD	NH3	Surf glycols	TRCu	TRPb	TRZn	Dou	DPb	DZn	Hard	cond		avg rank	depth	tailhead				
11/19/98	SAC	0.40	2.34	66	0.18	0	73	8.1	66	52	6.6	0.5	n/a	2	0.032	0.0314	0.163	not analyzed	16	37	71%	90	100				
% rank									82%	88%	54%				64%	81%	58%								1		
1/20/99	EMC	0.35	0.42	28	0.08	0.95	22	6.2	92	52	5.8	0.10	0.06	2	0.022	0.013	0.168	0.006	0.001	0.012	14.5	34	56%	100	96		
% rank									96%	88%	41%				35%	26%	61%	0.25	0.08	0.07					63		
2/22/99	EMC	0.55	0.56	34	0.14	0.04	9	7.2	50	44	2	0.5	n/a	2	0.015	0.022	0.108	0.004	0.001	0.042	10	36	39%	95	96		
% rank									80%	81%	0%				19%	52%	22%	0.29	0.05	0.39					96		
3/24/99	EMC	0.26	0.26	19	0.08	0.15	40	6.3	41	32	5.9	0.57	0.26	2	0.020	0.017	0.134	not analyzed	10	31	43%	100	70		2		
% rank									32%	74%	45%				29%	39%	41%									2	
7/2/99	EMC	0.27	0.30	6	0.11	0	103	6.2	45	39	6.8	1	n/a	n/a	0.026	0.013	0.141	not analyzed	14	41	50%	100	70		2		
% rank									46%	76%	55%				47%	29%	46%									2	
average								7.1	54	40	5.3	0.5	0.1	2	0.037	0.017	0.139	0.005	0.001	0.041	13	36	52%	96	87		
								average result	63%	81%	39%				39%	46%	46%									87	
								average % rank																		87	
SDE4	Historical data (7/94-6/99)																										
								count	29	28	32	31	32	33	32												
								max	131	57	29	49	0.078	0.076	0.337												
								min	6.6	1.5	2.0	2.0	0.003	0.001	0.003												
								median	49	27	6.4				0.160												

SDS3	sample type	storm characteristics				concentration, mg/l												WET, % survival		Comment							
		depth	rep	rain	dur	pH	TSS	Turb	BOD	NH3	Surf glycols	TRCu	TRPb	TRZn	Dou	DPb	DZn	Hard	cond		avg rank	depth	tailhead				
11/13/99	SAC	0.52	0.96	62	0.15	0.05	31	7.5	24	29	17.8	0.5	n/a	11.5	0.022	0.004	0.169	0.014	0.001	0.068	24	66	79%	90	96		
% rank									96%	96%	65%			67%	68%	100%	0.61	0.26	0.20								
1/13/99	EMC	0.65	1.07	22	0.16	0	85	6.8	22	16	7.8	0.5	n/a	11	0.023	0.004	0.080	0.013	0.001	0.012	20	52	56%	60	95		
% rank									93%	87%	39%			63%	25%	65%	13%	0.55	0.26	0.40						95	
average								7.1	23	23	13	0.5		11	0.023	0.004	0.110	0.013	0.001	0.025	22	61	85	97			
								count	33	33	36	25	37	39	37												
								max	33	42	38	32	0.087	0.016	0.134												
								min	1	1	2	2	0.004	0.001	0.003												
								median	7	6	6	5	0.032	0.002	0.045												

SDN1	sample type	storm characteristics				concentration, mg/l												WET, % survival		Comment							
		depth	rep	rain	dur	pH	TSS	Turb	BOD	NH3	Surf glycols	TRCu	TRPb	TRZn	Dou	DPb	DZn	Hard	cond		avg rank	depth	tailhead				
11/13/99	EMC	0.61	0.96	62	0.15	0.05	31	6.0	53	46	2	0.5	n/a	n/a	0.024	0.0253	0.487	0.006	0.001	0.110	16	20	67%	60	40		
% rank									63%	100%	0%			67%	79%	94%	0.23	0.04	0.23								
1/13/99	EMC	0.65	1.07	22	0.16	0	85	7.0	78	31	2	0.5	n/a	n/a	0.024	0.048	0.182	0.005	0.001	0.033	8	22	61%	30	78		
% rank									94%	75%	0%			61%	100%	33%	0.19	0.02	0.18							78	
3/24/99	EMC	0.26	0.26	19	0.08	0.15	40	6.6	61	40	4.66	1	n/a	n/a	0.015	0.010	0.175	not analyzed	16	22	61%	10	63				
% rank									69%	88%	53%			30%	44%	28%										63	
5/11/99	EMC	0.13	0.14	10	0.08	0	50	7.1	26	26	0.238	0.246	n/a	0.046	0.004	0.278	0.043	0.001	0.117	14.2	14.2	52%	5	4			
% rank									53%					86%	10%	74%	0.94	0.29	0.42							4	
7/2/99	EMC	0.30	0.30	6	0.11	0	103	6.1	69	25	4.28	0.3	n/a	n/a	0.038	0.009	0.238	not analyzed	10	21	56%	not tested	33	2, 3			
% rank									63%	52%	36%			83%	32%	69%										33	
11/9/99	SAC	0.68	1.2	0.11	0.05	44			26	20	4.1	0.06	0.06	n/a	0.108	0.009	0.120	0.005	0.001	0.069	11.3	11.3	59%	not tested	60	not tested	
% rank																											60
average								6.9	57	32	3.5	0.46	0.06	n/a	0.042	0.020	0.240	0.005	0.001	0.071	12	21	60%	40	60		
								average rank	77%	79%	22%				60%	64%	56%										60
SDN1	Historical data (1/87-6/99)																										
								count	17	17	18	19	20	19													
								max	65	46	29	0.062	0.048	0.540													
								min	9.7	6.4	2	0.003	0.001	0.066													
								median	43	24	5	0.019	0.011	0.218													

39

AR 044514

1998-99 WET Testing Sample Data

SDN4	sample type	storm characteristics				concentration, mg/l															WET, % survival							
		depth	rep	rain	dur	maxint	48hr	acidyrant	pH	TSS	Turb	BOD	NH3	Surl	glycols	TRCu	TRPb	TRZn	Deu	DPb	DZn	Hard	cond	avg	rank	dsphnd	fathead	Comment
11/13/98	EMC	0.80	0.98	0.62	0.15	0.05	31	7.5	22	15	2	1	n/a	2	0.025	0.0012	0.127	0.021	0.001	0.049	0.24	24	75	65%	75	100		
	% rank							84%	86%	0%		23%	81%	100%	0.8379	0.83	0.38											
1/13/99	EMC	0.65	1.07	0.22	0.16	0	85	6.8	7	9.2	2	0.5	n/a	2	0.020	0.001	0.084	0.014	0.001	0.027	0.28	28	56	41%	100	100		
	% rank							57%	78%	0%		9%	27%	77%	0.7085	n/a	0.79											
	average							7.1	15	12	2	0.8		2	0.023	0.001	0.081	0.018	0.001	0.038	0.28	68				86	100	
								count	20	20	22		16	22	23	23												
								SDN4	Historical data (7/94-8/99)	max	27	23	36	34	0.091	0.003	0.127											
									min	2	2	2	2	0.015	0.001	0.014												
									median	4	5	4	2	0.035	0.001	0.025												

comments

1. SDE4 Jan 20, 1999 sample: fathead test duration was 48-hr instead of 96-hr
2. July 2, 1999 sample: control failed at 72.5% survival (criterion is >90%)
3. July 2, 1999 SDN1 sample: insufficient # of organisms to start dep/nd test.
4. May 11, 1999 SDN1 sample taken for source tracing (was a non-storm) only, not to explicitly satisfy permit condition S10

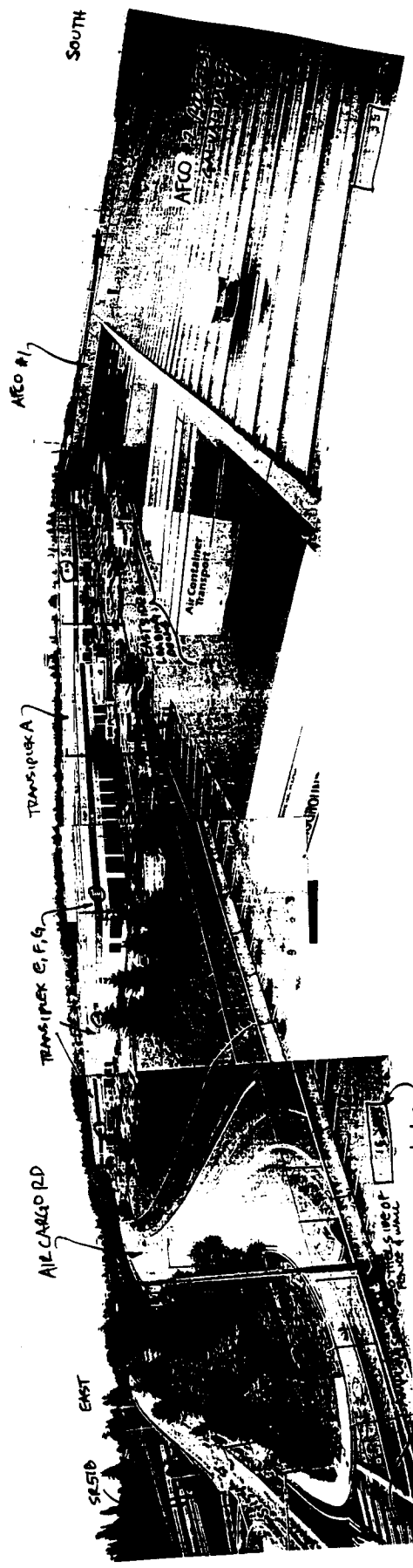
<MDL, value shown is 1/2 MDL
 exceeds single value and/or average criterion for survival

notes

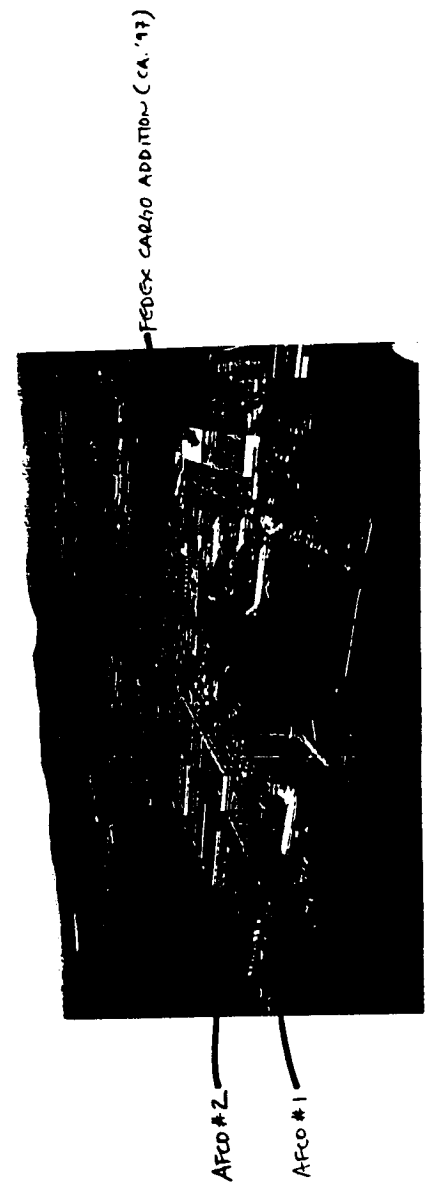
1. pH, ammonia, hardness, and conductivity measured at Parametrix toxicology lab
2. Dissolved metals not routinely analyzed, therefore, no summary statistics provided
3. Summary statistics for each outfall are relative trimmed data set July 1994 through June 30, 1999
4. All data for SDN1 are from "up" station located in manhole SDN1-22
5. Ammonia values <1 analyzed at Aquatic Research unless shown as shaded in table

EMC	sample type	storm characteristics				concentration, mg/l															WET, % survival							
		depth	rep	rain	dur	maxint	48hr	acidyrant	pH	TSS	Turb	BOD	NH3	Surl	glycols	TRCu	TRPb	TRZn	Deu	DPb	DZn	Hard	cond	avg	rank	dsphnd	fathead	Comment
11/6/99	bottle blank																											
11/6/99	eggt blank																											

6.2 Appendix B Photographs



PHOTOS TAKEN 8/10/99



LOOKING NORTHWEST PHOTO TAKEN SEPT 1997

H3

AR 044519

44

AR 044520

6.3 Appendix C Source Tracing Results

1999 SDNI Source Tracing In Multiple Upstream Monholes

event	rain		SDNI	name	seq	type	pH	IR			Diss			Diss/IR ratios			hard surf	NH3	hub	comment		
	in	in/hr						Cu	Pb	Zn	Cu	Pb	Zn	Cu	Pb	Zn					Cu	Pb
13-Jan-99	1.07	0.18	85	13.6	28	1	GRAB	6.83	0.006	0.001	0.044	0.005	0.001	0.021	0.68	0.48			Transplex rooftops			
13-Jan-99	1.07	0.18	85	13.6	28	2	GRAB	7.49	0.007	0.001	0.038	0.005	0.001	0.022	0.69	0.58			Transplex rooftops			
8-Mar-99	0.28	0.05	96	4.8	26		GRAB		0.011	0.001	0.040	0.005	0.001	0.012	0.44	0.30		4.29	Transplex rooftops			
24-Mar-99	0.28	0.08	40	3.2	26		1	GRAB	0.017	0.001	0.048	0.012	0.001	0.046	0.68	0.96		2.98	Transplex rooftops			
24-Mar-99	0.28	0.08	40	3.2	26		2	GRAB	0.017	0.001	0.045	0.014	0.001	0.036	0.81	0.78		6.53	Transplex rooftops			
8-Mar-99	0.28	0.05	96	4.8	32		GRAB	0.046	0.012	0.188	0.034	0.008	0.134	0.75	0.66	0.71	3.92	loading dock chain (Avia #2, doors B-E15)				
24-Mar-99	0.28	0.08	40	3.2	26		1	GRAB	0.121	0.023	0.400	0.111	0.019	0.320	0.92	0.84	6.6	6.6	loading dock chain (Avia #2, doors B-E15)			
24-Mar-99	0.28	0.08	40	3.2	32		2	GRAB	0.072	0.014	0.389	0.066	0.011	0.263	0.91	0.78	10.4	10.4	loading dock chain (Avia #2, doors B-E15)			
24-Mar-99	0.28	0.08	40	3.2	32		GRAB	0.009	0.001	0.108	0.007	0.001	0.034	0.78	0.31	1.49	1.49	AFCO Bldg #1 rooftop				
24-Mar-99	0.28	0.08	40	3.2	32		1	GRAB	0.060	0.003	0.133	0.013	0.001	0.122	0.42	0.29	2.24	2.24	AFCO Bldg #1 rooftop			
24-Mar-99	0.28	0.08	40	3.2	32		2	GRAB	0.032	0.001	0.330	0.020	0.001	0.217	0.63	0.66	2.8	2.8	AFCO Bldg #2 rooftop			
24-Mar-99	0.28	0.08	40	3.2	32		GRAB	0.008	0.001	0.083	0.005	0.001	0.033	0.65	0.40	1.31	1.31	AFCO Bldg #2 rooftop				
24-Mar-99	0.28	0.08	40	3.2	33		1	GRAB	0.017	0.001	0.091	0.013	0.001	0.074	0.78	0.81	3.92	3.92	AFCO Bldg #1 rooftop			
24-Mar-99	0.28	0.08	40	3.2	33		2	GRAB	0.063	0.003	0.464	0.033	0.001	0.333	0.62	0.38	6.69	4.1	AFCO Bldg #2 rooftop			
24-Mar-99	0.28	0.08	40	3.2	33		GRAB	0.017	0.021	0.180	0.001	0.001	0.037	0.05	0.06	0.21	6.34	6.34	Air Cargo Rch-Transplex+new FedEx			
8-Mar-99	0.28	0.05	96	4.8	41-31		GRAB	0.014	0.016	0.121	0.006	0.001	0.046	0.41	0.06	0.38			Air Cargo Rch-Transplex+new FedEx			
24-Mar-99	0.28	0.08	40	3.2	41-31		1	GRAB	0.009	0.003	0.149	0.007	0.001	0.092	0.76	0.33	0.62	8.39	Air Cargo Rch-Transplex+new FedEx			
24-Mar-99	0.28	0.08	40	3.2	41-31		2	GRAB	0.062	0.017	0.347	0.040	0.001	0.278	0.64	0.06	0.80		Air Cargo Rch-Transplex+new FedEx			
11-May-99	0.14	0.08	50	4	41-31		figrab	0.042	0.002	0.225	0.023	0.001	0.134	0.55	0.42	0.60	12.9	0.329	0.252	2.1 Air Cargo Rch-Transplex+new FedEx		
20-Jun-99	0.21	0.03	48	1.44	41-31		comp	0.082	0.005	0.526	0.060	0.001	0.394	0.73	0.20	0.76			31 Air Cargo Rch-Transplex+new FedEx			
2-Jul-99	0.3	0.11	103	11.3	41-31		1	GRAB	0.032	0.001	0.200								Air Cargo Rch-Transplex+new FedEx			
2-Jul-99	0.3	0.11	103	11.3	41-31		2	GRAB	0.026	0.001	0.205								Air Cargo Rch-Transplex+new FedEx			
2-Jul-99	0.3	0.11	103	11.3	41-31		COMP	0.035	0.009	0.209									Air Cargo Rch-Transplex+new FedEx			
6-Nov-99	0.68	0.11	44	4.84	41-31		comp	0.008	0.005	0.103	0.005	<0.002	0.056	0.58	na	0.54	11.9	0.067	0.08	16 Air Cargo Rch-Transplex+new FedEx		
13-Jan-99	1.07	0.18	85	13.6	41-34		GRAB	7.2	0.061	0.001	0.428	0.013	0.001	0.227	0.26	0.63				total AFCO rooftops		
8-Mar-99	0.28	0.05	96	4.8	41-34		GRAB		0.016	0.001	0.099	0.008	0.001	0.062	0.64	0.63				total AFCO rooftops		
24-Mar-99	0.28	0.08	40	3.2	41-34		1	GRAB	0.022	0.001	0.141	0.016	0.001	0.128	0.74	0.91	4.48	4.48		total AFCO rooftops		
24-Mar-99	0.28	0.08	40	3.2	41-34		2	GRAB	0.029	0.001	0.379	0.019	0.001	0.207	0.64	0.65	3.17	3.17		total AFCO rooftops		
11-May-99	0.14	0.08	50	4	41-34		figrab	0.022	0.001	0.649	0.016	0.001	0.210	0.70	0.32					39 total AFCO rooftops		
11-May-99	0.14	0.08	50	4	41-34		comp													2 total AFCO rooftops		
20-Jun-99	0.21	0.03	48	1.44	41-34		1	GRAB	0.028	0.001	0.300	0.017	0.001	0.188	0.61	0.63				total AFCO rooftops		
2-Jul-99	0.3	0.11	103	11.3	41-34		figrab	0.028	0.001	0.449	0.061	0.001	0.388	0.82	0.86					total AFCO rooftops		
2-Jul-99	0.3	0.11	103	11.3	41-34		2	GRAB	0.042	0.001	0.422									total AFCO rooftops		
2-Jul-99	0.3	0.11	103	11.3	41-34		COMP	0.030	0.001	0.264											total AFCO rooftops	
6-Nov-99	0.68	0.11	44	4.84	41-34		comp	0.006	<0.002	0.104	0.006	<0.002	0.097	0.95	na	0.93	2.15	<0.026	0.023	0.63	0.63	total AFCO rooftops

Indicates result <MDL, value shown is 1/2 MDL

6.4 Appendix D Matrix for Interpreting Chelation Test Results

Toxicity Removal by EDTA

		Strong	Weak	None
Toxicity Removal by Thiosulfate	Strong	Copper chloride Cadmium chloride Mercury [II] chloride (24h)	Silver Chloride	
	Weak	Zinc chloride Lead nitrate Nickel chloride	Manganese chloride Mercury [II] chloride (48h)	Sodium selenate
	None			Iron [II] chloride Chromium [III] chloride Potassium dichromate Sodium arsenate Sodium arsenite Sodium selenite Aluminum chloride

Modified from Hockett and Mount, 1996