



**THE CITY OF EDGEWOOD
STORMWATER MANAGEMENT PROGRAM**

March 2016

Prepared By – City of Edgewood, Department of Community Development

City of Edgewood, WA 98372

For use in NPDES Phase II implementation

Prepared in compliance with the provisions of
The State of Washington Water Pollution Control Law
Chapter 90.48 Revised Code of Washington

and

The Federal Water Pollution Control Act
(The Clean Water Act)

Title 33 United States Code, Section 1251 et seq.

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Introduction:

This document has been prepared to address the requirements of the National Pollutant Discharge Elimination System (NPDES) and State of Washington Water Pollution Control Law requirements for small cities and towns in Western Washington. The City of Edgewood (City) is covered by the Western Washington Phase II Municipal Stormwater Permit (Permit), which calls for development of a Stormwater Management Program (SWMP or Program).

The City's SWMP has been prepared to help reduce the discharge of pollutants from the City's Small Municipal Separate Storm Sewer System (MS4) to the maximum extent practicable (MEP), meet Washington State's All Known, Available, and Reasonable methods of prevention, control, and Treatment (AKART) requirements, and to protect water quality. All Permit required SWMP components and implementation schedules are included in the City's Program.

This document is intended to be used in conjunction with background information compiled in the 1997 Surface Water Management Plan by Kato & Warren, Inc.

The major components of the City's Program are:

1. An adopted current Stormwater Management Plan and regulations Manual.
2. Identification of potential point and non-point pollutant sources. This is known as Illicit Discharge Detection and Elimination (IDDE).
3. An on-going review, permitting, and monitoring process for new and redevelopment activities within the City with the goal of maintaining water quality of construction surface water runoff. (Part of Controlling Runoff from New Development, Redevelopment, and Construction Sites)
4. A record keeping/tracking system for industrial/commercial, and residential connections to the City's MS4. (Part of IDDE)
5. Identify areas of existing or future problem discharges to/from the MS4, if any. (Part of IDDE)
6. Establish a set of corrective measures as well as preventative maintenance activities to deal with any problem areas identified. Prioritize, budget, and implement an action plan for City's MS4 that addresses water quality issues. (O&M Pollution Prevention)
7. Continue working relationships with adjacent agencies to foster inter-agency coordination where systems/waterways cross jurisdictional boundaries.
8. Conduct public information, education, and outreach activities for surface water quality, bringing the programs' goals, objectives, and policies to the awareness of the City's residents. (Part of Public Outreach and Education)

9. Prepare annual reports that outline the program activities and accomplishments for submittal to Department of Ecology and for posting to the City's website.

Where the City is already implementing actions or activities called for in the Program, the City will continue those actions or activities regardless of the schedule called for in the Permit.

As part of the implementation of the City's Program, the City will gather, track, maintain and use information on an on-going basis to evaluate the Program development, implementation, Permit compliance, and to set priorities. The City will track the cost (or estimated cost) of development and implementation of each component of the Program and will provide these costs to Ecology upon request. The City will also track the number of inspections, official enforcement actions and types of public education activities as required by the respective program component. This information will be included in the City's annual report.

This Program will be updated at least annually for submittal with the City's annual report to Ecology.

Section 1: Public Education and Outreach

The City's Program includes a public education and outreach program aimed at residents, businesses, industries, elected officials, policy makers, planning staff, and other employees of the City. The goal of the program is to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. The City's education program has been developed locally and regionally.

The City is taking the following actions and conducting the following activities:

- a. **Education and Outreach Program:**

The City will continue to provide an education and outreach program for the area served by its MS4. The program is designed to achieve measurable improvements in the target audience's understanding of the stormwater problem and what the audience or individual(s) can do to solve it.

- i. To build general awareness, the City's education and outreach efforts will be prioritized to target the following audiences and subject areas:

- (a) General public

- General impacts of stormwater flows into surface waters.
- Impacts from impervious surfaces.
- Impacts of illicit discharges and how to report them.
- Low impact development (LID) principles and LID BMPs.

- Source control Best Management Practices (BMPs) and local environmental stewardship actions and opportunities.
- (b) Engineers, contractors, developers, review staff, and land use planners
- Technical standards for stormwater site development and erosion control plans.
 - Low Impact Development techniques, including site design, pervious paving, roof gardens, rain gardens, use of native plants in landscaping, retention of forest understory and mature trees.
 - Stormwater treatment and flow control BMPs, their proper design, application, operation & maintenance (O&M).
- ii. To effect behavior, the City's education and outreach efforts will be prioritized to target the following audiences and subject areas:
- (a) General public, businesses (including home-based and mobile businesses)
- BMPs for use and storage of automotive chemicals, hazardous cleaning supplies, carwash soaps and other hazardous materials.
 - Equipment maintenance.
 - Prevention of illicit discharges.
- (b) Residents, landscapers and property managers
- Yard care techniques protective of water quality.
 - BMPs for use and storage of pesticides and fertilizers and other household chemicals.
 - BMPs for carpet cleaning and auto repair and maintenance.
 - Vehicle, equipment and home/building maintenance
 - Pet waste management and disposal.
 - Low Impact Development (LID) techniques, including site design, pervious paving, retention of forests and mature trees.
 - Landscape planting schemes designed with primarily native plant species that minimize the need for supplemental watering during dry seasons.
 - Stormwater facility maintenance.
 - Dumpster and trash compactor maintenance.

b. Stewardship Opportunities

The City will create stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities such as stream teams, storm drain marking, volunteer monitoring, riparian plantings and education activities. The City may work with the Pierce Conservation District to create or support existing “Stream Teams”, which coordinate efforts to maintain and monitor stream ecology for streams and creeks within the City’s or adjacent jurisdictions.

c. Measurement:

The City measured the understanding and adoption of the targeted behaviors for at least one target audience in at least one subject area. By February 2, 2016 the City used the resultant measurements to direct education and outreach resources most effectively and to evaluate changes in adoption of the target behaviors. The City may choose to meet this requirement individually or as a member of a regional group.

d. Tracking:

The City will track and maintain records of public education and outreach activities. This could be augmented under a contract with the Pierce Conservation District.

Section 2: Public Involvement and Participation

The Program will include ongoing opportunities for public involvement through advisory councils, watershed committees, participation in developing rate-structures, stewardship programs, environmental activities, and/or other similar activities. The City will comply with applicable State and local public notice requirements when developing its Program.

The City will take the following actions and conduct the following activities:

a. Opportunities for Public Participation:

The City will continue to create opportunities for the public to participate in the decision-making processes involving the development, implementation, and update of the City’s entire Program. The City has developed and implemented a process for consideration of public comments on its Program. Local updates the development code will continue to be formally noticed per the Edgewood Municipal Code with opportunity to provide both informal and formal written and oral comments at Public Hearings before the Planning Commission and City Council.

b. Availability of Documents:

The City will make its Program, its annual report, and all other submittals required by the Permit available to the public. The annual report and most recent SWMP will be posted on the City’s website no later than May 31 each year. General information related to programs and public outreach and education will be updated periodically on the City’s website and at public locations where the City maintains display boards.

Section 3: Illicit Discharge Detection and Elimination (IDDE)

The Program includes an ongoing program to prevent, detect, characterize, trace, and eliminate illicit connections, illicit discharges, and improper stormwater pollutant disposal into the City's MS4.

The City is taking the following actions and conducting the following activities:

a. Development of MS4 Map:

A map of the MS4 utilizing GIS mapping software has been developed and is updated on a continual basis. The City contracted with Pierce County GIS services office in the Summer of 2009 to accomplish this effort. If necessary, the MS4 map will be updated by February 2, 2018 to meet the Permit requirements outlined in Section S5.C.3. The map includes the following information:

- i. The location of all known MS4 outfalls and discharge points.
- ii. Receiving waters, other than groundwater.
- iii. Structural stormwater BMPs/facilities owned, operated, and/or maintained by the City.
- iv. Tributary conveyances to all known outfalls and discharge points with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems. The following attributes of all such pipes/non-pipes are mapped:
 - Tributary conveyance type, material, and size where known.
 - Associated drainage areas.
 - Land use.
- v. All connections to the MS4 authorized or allowed by the City after February 16, 2007.
- vi. Connections between the MS4 owned or operated by the City and other municipalities or public entities.
- vii. Geographic areas served by the City's MS4 that do not discharge stormwater to surface waters.
- viii. To the extent consistent with national security laws and directives, the City will make available to Ecology, upon request, the MS4 map depicting the information required in (i) through (vi) above.
- xi. Upon request, and to the extent appropriate, the City will provide mapping information to federally-recognized Indian Tribes, municipalities, and other Permittees.

b. IDDE Ordinance:

Edgewood Municipal Code (EMC) chapter 13.25 effectively prohibits non-stormwater, illegal discharges, and/or dumping into the City's MS4 to the maximum extent allowable under State and Federal law.

- i. EMC Chapter 13.25 allows the following categories of non-stormwater discharges:
 - Diverted stream flows.
 - Rising ground waters.
 - Uncontaminated ground water infiltration as defined at 40 CFR 35.2005(20).
 - Uncontaminated pumped ground water.
 - Foundation drains.
 - Air conditioning condensation.
 - Irrigation water from agricultural sources that is commingled with urban stormwater.
 - Springs.
 - Water from crawl space pumps.
 - Footing drains.
 - Flows from riparian habitats and wetlands.
 - Discharges from emergency fire fighting activities.
- ii. EMC Chapter 13.25 prohibits the following categories of non-stormwater discharges unless the stated conditions are met:
 - Discharges from potable water sources, including water line flushing, hyperchlorinated water line flushing, fire hydrant system flushing, and pipeline hydrostatic test water. (Mt. View-Edgewood water is not chlorinated.) Planned discharges will be dechlorinated to a concentration of 0.1 ppm or less, pH-adjusted, if necessary, and volumetrically and velocity controlled to prevent re-suspension of sediments in the MS4.
 - Discharges from lawn watering and other irrigation runoff. These will be minimized through, at a minimum, public education activities (see Section 1) and water conservation efforts.
 - Dechlorinated swimming pool discharges. These discharges will be dechlorinated to a concentration of 0.1 ppm or less, pH-adjusted and reoxygenized, if necessary, volumetrically and velocity controlled to prevent re-suspension of sediments in the MS4. Swimming pool cleaning wastewater and filter backwash shall not be discharged to the MS4. As required in the City's NPDES Phase II permit, Section S5.C.3.b.ii, these discharges

shall be dechlorinated to a concentration of 0.1 ppm or less, pH-adjusted and reoxygenized, if necessary, and volumetrically and velocity controlled to prevent re-suspension of sediments in the MS4.

- Street and sidewalk wash water, water used to control dust, and routine external building wash down that does not use detergents. These shall be reduced through, at a minimum, public education activities (see Section 1) and/or water conservation efforts. To avoid washing pollutants into the MS4, the amount of street wash and dust control water used must be minimized. At active construction sites, street sweeping must be performed prior to washing the street.
- Nonstormwater discharges covered by another NPDES permit; provided, that the discharger is in full compliance with all requirements of the permit, waiver, or order and other applicable laws and regulations; and provided, that written approval has been granted for any discharge to the MS4.
- Other non-stormwater discharges. The discharges shall be in compliance with the requirements of the stormwater pollution prevention plan (SWPPP) reviewed and approved by the City, which addresses control of such discharges by applying AKART to prevent contaminants from entering the City's MS4.

- iii. The City will further address any category of discharges in (i) or (ii), above, if the discharges are identified as significant sources of pollutants to waters of the State.
- iv. EMC Chapter 13.25 includes escalating enforcement procedures and actions.
- v. The City has implemented a compliance strategy that includes informal compliance actions such as public education (see Section 1) and technical assistance as well as the enforcement provisions of EMC Chapter 13.25.
- vi. The City will revise EMC Chapter 13.25 by February 2, 2018, if necessary, to meet the requirements of Section S5.C.3 of the Permit.

c. Ongoing IDDE: Detection and Identification Program

The City is implementing an ongoing program to detect and identify non-stormwater discharges and illicit connections into the City's MS4. The program includes:

- i. Procedures for conducting investigations of the City's MS4, including field screening and methods for identifying potential sources.

The City has implemented a field screening methodology appropriate to its MS4 and its water quality concerns. Screening for illicit connections will be conducted using: *Illicit Discharge*

Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments, Center for Watershed Protection, October 2004, or another methodology of comparable effectiveness. The City will document the field screening methodology in its annual report.

The City will complete field screening for at least 40% of its MS4 no later than December 31, 2017, and on average 12% each year thereafter.

- ii. A publicly listed and publicized hotline or other telephone number for reporting of spills and other illicit discharges. This number is the main City telephone number, which is posted on the City's website.
- iii. An ongoing training program for all municipal field staff, who, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge and/or illicit connection to the MS4, on the identification of an illicit discharge and/or connection, and on the proper procedures for reporting and responding to the illicit discharge and/or connection. Follow-up training will be provided as needed to address changes in procedures, techniques, requirements, or staffing. The City will document and maintain records of the trainings provided and the staff trained.
- iv. The City informs public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.

d. Ongoing IDDE: Addressing Illicit Discharges

The City is implementing an ongoing program to address illicit discharges, including spills and illicit connections, into the City's MS4. The program includes:

- i. Procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the City. Procedures address the evaluation of whether the discharge must be immediately contained and steps to be taken for containment of the discharge.
- ii. Procedures for tracing the source of an illicit discharge; including visual inspections, and when necessary, opening manholes, using mobile cameras, collecting and analyzing water samples, and/or other detailed inspection procedures.
- iii. Procedures for eliminating the discharge; including notification of appropriate authorities; notification of the property owner; technical assistance; follow-up inspections; and use of the compliance strategy developed, including escalating enforcement and legal actions if the discharge is not eliminated.
- iv. Compliance with the provisions in (i), (ii), and (iii), above, will be achieved by meeting the following timelines:

- Immediately respond to all illicit discharges, including spills, which are determined to constitute a threat to human health, welfare, or the environment, consistent with General Condition G3.
- Investigate (or refer to the appropriate agency with the authority to act) within 7 days, on average, any complaints, reports or monitoring information that indicates a potential illicit discharge.
- Initiate an investigation within 21 days of a report or discovery of a suspected illicit connection to determine: the source of the connection, the nature and volume of discharge through the connection, and the party or parties responsible for the connection
- Upon confirmation of an illicit connection, use the compliance strategy in a documented effort to eliminate the connection within 180 days. All known illicit connections to the MS4 will be eliminated.

e. Training:

The City will train all municipal field staff who are responsible for identification, investigation, termination, cleanup, and reporting illicit discharges, including spills, improper disposal, and illicit connections, to conduct these activities. Follow-up training will be provided as needed to address changes in procedures, techniques, or requirements. The City will document and maintain records of the training provided and the staff trained.

f. Recordkeeping:

The City will track and maintain records of the activities conducted to meet the requirements of Section S5.C.3 of the Permit.

Section 4: Controlling Runoff from New Development, Redevelopment and Construction Sites

The City has implemented and is enforcing a program to reduce pollutants in stormwater runoff to its MS4 from new development, redevelopment, and construction site activities. The program applies to private and public development, including roads.

The City is taking the following actions and is conducting the following activities:

a. Ordinance:

The program includes EMC Chapter 13.05 which addresses runoff from new development, redevelopment, and construction site projects. If necessary, any revisions or updates to EMC Chapter 13.05 will be adopted and effective no later than December 31, 2016. The program adopted to meet the requirements in (i) through (iii), below, will apply to all applications submitted on or after January 1, 2017 and will apply to applications submitted prior to January 1, 2017, which have not started construction by January 1, 2022.

EMC Chapter 13.05 includes:

- i. The Minimum Requirements, technical thresholds, and definitions in Appendix 1 of the City’s Permit or an equivalent approved by Ecology under the 2013 NPDES Phase I Municipal Stormwater Permit, for new development, redevelopment, and construction sites. Adjustment and variance criteria equivalent to those in Appendix 1 of the City’s Permit are included. The City has in the past and may in the future implement more stringent requirements and/or tailor specific requirements to local circumstances through the use of basin plans or other similar water quality and quantity planning efforts. Such local requirements will provide equal protection of receiving waters and equal levels of pollutant control to those provided in Appendix 1 of the City’s Permit.
- ii. The following requirements, limitations, and criteria that, when used to implement the minimum requirements in Appendix 1 of the City’s Permit protect water quality, reduce the discharge of pollutants to the MEP and satisfy the State requirement under Chapter 90.48 RCW to apply AKART prior to discharge.
 - (a) Site planning requirements
 - (b) BMP selection criteria
 - (c) BMP design criteria
 - (d) BMP infeasibility criteria
 - (e) LID competing needs criteria
 - (f) BMP limitations

The City will document how the criteria and requirements will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy State AKART requirements.

The City chooses to use the site planning process and BMP selection and design criteria in the 2005 Stormwater Management Manual for Western Washington (SWMMWW), as modified to be more restrictive, as its sole documentation to meet this requirement.

- iii. The legal authority, through the approval process for new development and redevelopment, to inspect and enforce maintenance standards for private stormwater facilities approved under the provisions of Permit Section S5.C.4 that discharge to the City’s MS4.

b. Permitting Process:

The program includes a permitting process with plan review, inspection and enforcement capability to meet the standards listed in (i) through (iv) below, for both private and public projects, using qualified personnel (as defined in the Permit’s *Definitions and Acronyms*). At a minimum, the program will be applied to all sites that meet the minimum thresholds adopted pursuant to Section S5.C.4.a.i of the Permit.

- i. The City reviews all stormwater site plans for proposed development activities.

- ii. The City inspects, prior to clearing and construction, all permitted development sites that meet the minimum thresholds adopted pursuant to S5.C.4.a.i of the Permit.
- iii. The City inspects all permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls. Enforcement actions are taken, as necessary, based on the inspection.
- iv. The City inspects all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater controls such as stormwater facilities and structural BMPs. Also, the City verifies that a maintenance plan is completed and responsibility for maintenance is assigned. The City requires the homeowners association for every new and existing development to take responsibility of and maintain stormwater systems and facilities installed within the development. Enforcement actions are taken, as necessary, based on the inspection.
- v. Compliance with the inspection requirements in (ii), (iii) and (iv), above, is determined by the presence and records of an established inspection program designed to inspect all sites. Compliance is determined by achieving at least 80% of scheduled inspections.
- vi. An enforcement strategy has been implemented to respond to issues of non-compliance. The enforcement strategy is included in EMC Chapter 13.05.

c. Long-term Operation and Maintenance:

The Program will include provisions to verify adequate long-term operation and maintenance (O&M) of stormwater treatment and flow control facilities and BMPs that are permitted and constructed pursuant to (b) above. These provisions will be in place no later than December 31, 2016 and will include:

- i. Adoption of an ordinance or other enforceable mechanism that clearly identifies the party responsible for maintenance, requires inspection of facilities in accordance with the requirements in (ii) through (iv), below, and establishes enforcement procedures.
- ii. The City will establish maintenance standards that are as protective as or more protective of facility function than those specified in Chapter 4 of Volume V of the SWMMWW. For facilities which do not have maintenance standards, the City will develop a maintenance standard.
- iii. Annual inspections of all stormwater treatment and flow control BMPs and facilities that discharge to the City's MS4 and were permitted by the City according to Section 4.b, unless there are maintenance records to justify a different frequency.

Reducing the inspection frequency will be based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records, the City may

substitute written statements to document a specific less frequent inspection schedule. Written statements will be based on actual inspection and maintenance experience and will be certified in accordance with G19 of the Permit, *Certification and Signature*.

- iv. Inspections of all new flow control and water quality treatment BMPs and facilities, including catch basins, for new residential developments every 6 months until 90% of the lots are constructed (or when construction is stopped and the site is fully stabilized) to identify maintenance needs and enforce compliance with maintenance standards as needed.
- v. Compliance with the inspection requirements in (iii) and (iv), above, will be determined by the presence and records of an established inspection program designed to inspect all sites. Compliance during this permit term will be determined by achieving at least 80% of scheduled inspections.
- vi. Unless there are circumstances beyond the City's control, when an inspection identifies an exceedance of the maintenance standard, maintenance will be performed:
 - Within 1 year for typical maintenance of facilities, except catch basins.
 - Within 6 months for catch basins.
 - Within 2 years for maintenance that requires capital construction of less than \$25,000.

Circumstances beyond the City's control include denial or delay of access by property owners, denial or delay of necessary permit approvals, and unexpected reallocations of maintenance staff to perform emergency work. For each exceedance of the required timeframe, the City will document the circumstances and how they were beyond its control.

- vii. The City's Program includes a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities will be maintained.

d. Availability of NOIs:

The City will make available copies of the "Notice of Intent for Construction Activity" and copies of the "Notice of Intent for Industrial Activity" to representatives of proposed new development and redevelopment. The City will continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology.

e. Training:

The City will verify that all staff and contracted agents responsible for implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities. Follow-up training will be provided as needed to address changes in procedures, techniques or staffing. The City will document and maintain records of the training provided and the staff trained.

f. Low Impact Development Requirements:

- i. No later than December 31, 2016, the City will review, revise and make effective their local development-related codes, rules, standards, or other enforceable documents to incorporate and require LID principles and LID BMPs.

The intent of the revisions will be to make LID the preferred and commonly-used approach to site development. The revisions will be designed to minimize impervious surfaces, native vegetation loss, and stormwater runoff in all types of development situations. The City will conduct a similar review and revision process, and consider the range of issues, outlined in *Integrating LID into Local Codes: A Guidebook for Local Governments* (Puget Sound Partnership, 2012).

- ii. The City will submit a summary of the results of the review and revision process in (i) above with the annual report due no later than March 31, 2017. This summary will include, at a minimum, a list of the participants (job title, brief job description, and department represented), the codes, rules, standards, and other enforceable documents reviewed, and the revisions made to those documents which incorporate and require LID principles and LID BMPs. The summary will include existing requirements for LID principles and LID BMPs in development-related codes. The summary will be organized as follows:

- (a) Measures to minimize impervious surfaces;
(b) Measures to minimize loss of native vegetation; and
(c) Other measures to minimize stormwater runoff.

g. Watershed-scale Stormwater Planning

The City does not participate in any watershed-scale stormwater planning as it does not have all or part of its coverage area in a watershed selected by a Phase I county for watershed-scale stormwater planning.

Section 5: Municipal Operation and Maintenance

The City will develop and implement an operations and maintenance (O&M) program that includes a training component and that has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.

The City will take the following actions and conduct the following activities:

a. Maintenance Standards:

The City will establish maintenance standards that are as protective as or more protective of facility function than those specified in Chapter 4 of Volume V of the SWMMWW. For facilities which do not have maintenance standards, the City will develop a maintenance standard. No later than December 31, 2016 the City will update its maintenance standards, as necessary, to meet the requirements of Permit Section S5.C.5.

- i. The purpose of the maintenance standard is to determine if maintenance is required. The maintenance standard is not a measure of the facilities required condition at all times between inspections. Exceeding the maintenance standard between inspections and/or maintenance is not a Permit violation.
- ii. Unless there are circumstances beyond the City's control, when an inspection identifies an exceedance of the maintenance standard, maintenance will be performed:
 - Within 1 year for typical maintenance of facilities, except catch basins.
 - Within 6 months for catch basins.
 - Within 2 years for maintenance that requires capital construction of less than \$25,000.

Circumstances beyond the City's control include denial or delay of access by property owners, denial or delay of necessary permit approvals, and unexpected reallocations of maintenance staff to perform emergency work. For each exceedance of the required timeframe, the City will document the circumstances and how they were beyond its control.

b. General Inspections:

The City will conduct annual inspections of all municipally owned or operated permanent stormwater treatment and flow control facilities, other than catch basins, and will take appropriate maintenance actions in accordance with the adopted maintenance standards. The annual inspection requirement may be reduced based on inspection records.

Reducing the inspection frequency will be based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records, the City may substitute written statements to document a specific less frequent inspection schedule. Written statements will be based on actual inspection and maintenance experience and will be certified in accordance with G19 of the Permit, *Certification and Signature*.

c. Post-Storm Inspections:

The City will conduct spot checks of potentially damaged permanent treatment and flow control facilities after major (24 hour storm event with a 10 year or greater recurrence interval) storm events. If spot checks indicate widespread damage and/or maintenance needs, the City will inspect all stormwater treatment and flow control facilities that may have been affected.

The City will conduct repairs or takes appropriate maintenance action in accordance with maintenance standards established above, based on the results of the inspections.

d. Catch Basins and Inlet Inspections:

The City will inspect all catch basins and inlets it owns and/or operates at least once no later than August 1, 2017 and every two years thereafter. The City will clean catch basins if the inspection indicates cleaning is needed to comply with maintenance standards established in the SWMMWW. Decant water will be disposed of in accordance with Appendix 6 of the City's Permit, *Street Waste Disposal*.

e. Compliance:

The City is in compliance the inspection requirements in b, c and d above. Compliance is determined by the presence of an established inspection program designed to inspect all sites and achieving inspection of 95% of all sites.

f. Reduction of Stormwater Impacts:

i. The City's goals in this area include establishment and implementation of practices, policies, and procedures to reduce stormwater impacts associated with runoff from streets, parking lots, roads, or highways owned or maintained by the City, and road maintenance activities conducted by the City. The City and Pierce County (whose forces the City contracts for roads maintenance) were included in the Regional Road Maintenance ESA Program Guidelines (Regional Program) that describes physical, structural, and managerial best management practices designed so that when they are used, singularly or in combination, they reduce road maintenance activities' impacts on water and habitat. The following activities are addressed in the Regional Program:

- Pipe cleaning
- Cleaning of culverts that convey stormwater in ditch systems
- Ditch maintenance
- Street cleaning
- Road repair and resurfacing, including pavement grinding and shoulder restoration
- Snow and ice control
- Utility installation
- Pavement striping maintenance
- Maintaining roadside areas, including vegetation management

- Dust control
- ii. The City has implemented policies and procedures to reduce pollutants in discharges from all lands owned or maintained by the City and subject to the City's Permit, including but not limited to: parks, open space, road right-of-way, maintenance yards, and stormwater treatment and flow control facilities. These policies and procedures address, but are not limited to:
- Application of fertilizer, pesticides, and herbicides including the development of nutrient management and integrated pest management plans.
 - Sediment and erosion control.
 - Landscape maintenance and vegetation disposal.
 - Trash and pet waste management.
 - Building exterior cleaning and maintenance.
- g. Training:
- The City has implemented an on-going training program for employees of the City whose construction, operations or maintenance job functions may impact stormwater quality. This includes the City's building inspectors who provide front line review of small development projects (CESL certified), maintenance staff, planning and permitting staff, and contracted maintenance staff (Pierce County Roads Maintenance contracts for the majority of the City road functions and already trains its employees in the policies and procedures outlined in the Regional Program). The training program addresses the importance of protecting water quality, the requirements of the City's Permit, operation and maintenance standards, inspection procedures, selecting appropriate BMPs, ways to perform their job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns, including potential illicit discharges. Follow-up training will be provided as needed to address changes in procedures, techniques or requirements. The City will document and maintain records of training provided.
- h. Special Facility Requirements:
- The City does not currently own or operate any heavy equipment maintenance or storage yards or any material storage facilities in areas subject to the City's Permit that are not required to have coverage under the under the *General NPDES Permit for Stormwater Discharges Associated with Industrial Activities* or another NPDES permit that authorizes stormwater discharges associated with the activity. If in the future the City begins to operate or comes into ownership of such facilities, the City will implement a Stormwater Pollution Prevention Plan (SWPPP) for each facility. Implementation of non-structural BMPs will begin immediately after the SWPPP is developed. A schedule for implementation of structural BMPs will be included in each SWPPP. Generic SWPPPs that can be applied at multiple sites may be used

to comply with this requirement. The SWPPP(s) will include periodic visual observation of discharges from the facility to evaluate the effectiveness of the BMPs.

i. Record Keeping:

Records of inspections and maintenance or repair activities conducted by the City will be maintained in accordance with S9 of the City's Permit.

Section 6: Compliance With Total Maximum Daily Load Requirements

In accordance with Section S7 of the Permit, the City will be required to show compliance because it is within the "Puyallup Watershed Water Quality Improvement Project" (Puyallup TMDL), which is an EPA approved TMDL listed in Appendix 2 of the Permit.

- a. The City will designate areas discharging via the MS4 to Jovita Creek as the highest priority areas for illicit discharge detection and elimination routine field screening and will implement the schedules and activities identified in S5.C.3 of the Permit.
- b. The City will keep records of all actions required by the Permit that are relevant to the Puyallup TMDL. The status of the Puyallup TMDL implementation will be included as part of the annual report submitted to Ecology. Each annual report will include a summary of relevant SWMP and Appendix 2 activities conducted in the Puyallup TMDL area to address the fecal coliform TMDL parameter.
- c. The City will include such monitoring and record keeping provisions for future TMDLs that EPA may approve in the future. This will be accomplished through the permit modification process established by DOE.

Section 7: Monitoring

The City will institute any sampling or testing required to characterize suspected or confirmed illicit discharges identified under Section 3 IDDE.

a. Status and trends Monitoring

The City participates in Option #1, payment into a collective fund to implement the Regional Stormwater Monitoring Program (RSMP) for small streams and marine nearshore status and trends monitoring in Puget Sound. It plans to continue its participation through the end of the permit cycle to meet this requirement.

b. Stormwater Management Program Effectiveness Studies

The City participates in Option #1, payment into a collective fund to implement the RSMP for effectiveness studies.

c. Source Identification and Diagnostic Monitoring

The City pays into a collective fund to implement the RSMP Source Identification Information Repository (SIDIR).

Section 8: Reporting Requirements

- a. No later than March 31 of each year beginning in 2015, the City will submit an annual report. The reporting period for the first annual report will be from January 1, 2014 through December 31, 2014. The reporting period for all subsequent annual reports will be the previous calendar year.

The City will submit annual reports electronically using Ecology's Water Quality Permitting Portal (WQWebPortal) available on Ecology's website at: <http://www.ecy.wa.gov/programs/wq/permits/paris/portal.html> unless otherwise directed by Ecology.

- b. The City will keep all records related to the Permit and the SWMP for at least five years.
- c. The City will make all records related to the Permit and its SWMP available to the public at reasonable times during business hours. The City will provide a copy of the most recent annual report to any individual or entity, upon request.
 1. A reasonable charge may be assessed by the City for making photocopies of records.
 2. The City may require reasonable advance notice of intent to review records related to this Permit.
- d. Each annual report will include the following:
 1. A copy of the City's current SWMP
 2. Submittal of the annual report form as provided by Ecology pursuant to S9.A, describing the status of implementation of the requirements of the Permit during the reporting period.
 3. Attachments to the annual report form including summaries, descriptions, reports, and other information as required, or as applicable, to meet the requirements of the Permit.
 4. If applicable, notice that the MS4 is relying on another governmental entity to satisfy any of the obligations under the Permit.
 5. Certification and signature pursuant to G19.D, and notification of any changes to authorization pursuant to G19.C.
 6. The City will include with the annual report, notification of any annexations, incorporations or jurisdictional boundary changes resulting in an increase or decrease in the City's geographic area of permit coverage during the reporting period, and implications for the SWMP.