



City of Edgewood
2025 Stormwater Management Program (SWMP)



City of Edgewood, WA
March, 2025

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City of Edgewood

2024 Stormwater Management Program

1. Introduction

1.1 Purpose

This document is the City of Edgewood's Stormwater Management Program (SWMP). Preparation and maintenance of this SWMP is required by the Western Washington Phase II Municipal Stormwater Permit (Permit) which is overseen by the Washington State Department of Ecology (ECY). The Permit requires that the City prepare a document outlining the programs and actions that the City intends to take in order to maintain compliance with the Permit. This report covers activities planned for 2025. All Edgewood residents and businesses are encouraged to call the NPDES/ Surface Water Program Coordinator at 253-878-2632 with any questions or suggestions regarding any information in this report.

1.2 The NPDES Program

The National Pollutant Discharge Elimination System (NPDES) is a program created under the Federal Clean Water Act with the intent of protecting and restoring water quality in lakes, streams, and other surface waters so that they can support “beneficial uses” such as fishing and swimming. Governmental and private entities wishing to discharge water or wastewater to surface waters for certain activities regulated by the federal government are required to obtain permits and comply with permit conditions or face the potential for fines and other penalties.

NPDES permits are required for large construction sites, a variety of industrial activities, publicly owned wastewater treatment plants, and municipal stormwater systems. In Washington State, the US Environmental Protection Agency has delegated the authority over NPDES permits to the Washington State Department of Ecology (Ecology). Ecology has two different types of general permits for stormwater discharges. Phase I generally refers to municipalities with populations greater than 100,000, while Phase II applies to municipalities with a population of less than 100,000 and are in urban areas.

1.3 The Western Washington Phase II Municipal Stormwater Permit

Edgewood must comply with the conditions in the Western Washington Phase II Municipal Stormwater Permit. The Permit allows municipalities to discharge stormwater from municipal systems into “waters of the state” such as rivers, lakes, and streams, as long as programs are implemented to reduce pollutants in stormwater to the “maximum extent practicable”. The city is required to develop and maintain programs and conduct activities in the following program areas:

- Stormwater Planning
- Public Education and Outreach
- Public Involvement and Participation
- MS4 (Municipal Separate Storm Sewer System) Mapping
- Illicit Discharge Detection and Elimination (IDDE)
- Controlling Runoff from New Development, Redevelopment, and Construction Sites
- Municipal Operations and Maintenance
- Source Control for Existing Development

In addition to the SWMP components, the Permit contains special conditions covering:

- Compliance with Total Maximum Daily Load (TMDL) requirements
- Monitoring and Assessment
- Reporting Requirements

The City's SWMP Plan must be prepared and submitted annually and must contain the planned actions and activities that will be used in the current year to maintain compliance with the permit. The SWMP is available upon request at any time and is required to be posted on the Edgewood website no later than May 31st each year.

1.4 Permit History and Implementation

The original NPDES Phase II Permit was valid for 5 years, from February 17, 2007 to February 15, 2012, and allowed for phased implementation of stormwater management programs and actions. In 2012, Ecology extended the existing Permit to July 31, 2013 with no new permit conditions.

The next permit was issued on August 1, 2012, was modified January 16, 2015 and was set to expire on July 31, 2018. Ecology decided in 2018 to extend permits into 2019 as they need more time to finish the new permit language. On August 1, 2019 the next permit was issued and it expired on July 31, 2024.

The new permit was made effective on August 1, 2024 and expires on July 31, 2029. It includes increased regulations and programs for compliance. Like the previous permit, it allows for phased implementation of requirements over the five-year permit cycle. At this writing, Edgewood continues to be in the position to meet deadlines and maintain permit compliance.

1.5 Current and Planned Activities

The SWMP Plan is a set of actions and activities comprising the stormwater program components listed in the Permit and the actions necessary for permit compliance. The plan is organized in accordance with program components addressed in Condition S5.C of the Permit. The following sections of the SWMP Plan describe requirements in the Permit, followed by the ongoing and planned activities to meet each permit component.

1.6 City Coordination and Responsibilities

Compliance with the Permit requires coordination and documentation of activities across City departments. The Public Works Department Stormwater Group coordinates city programs and activities and meets with staff from other departments regularly to ensure that current and planned activities meet Permit requirements. Activities required for Permit compliance cover a broad range of municipal activities.

2. Stormwater Management Program Administration

2.1 Permit Requirements

Each permittee shall implement a Stormwater Planning program to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters. Permit requirements and key compliance dates are described here.

March 31st Annually Stormwater Management Program Administration. Submit the annual report electronically using Ecology's Water Quality Permitting Portal (WQWebPortal).

August 15th Annually Monitoring and Assessment. Pay Edgewood's fee for participating in the collectively funded regional Stormwater Action Monitoring (SAM) Collective Fund to Ecology by August 15th annually.

July 1, 2025 -Public Education and Outreach

- S5.C.2.a.ii.(b) Based on the recommendation from the 2024 evaluate and report, follow social marketing practices and methods and develop a campaign that is tailored to the community, including development of a program evaluation plan.

September 1, 2025 -Public Education and Outreach

- S5.C.2.a.ii.(c) Begin to implement the strategy developed in C.2.a.ii.(b).

March 31, 2026 -MS4 Mapping and Documentation

- S5.C.4.b.i Submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report. This reporting shall include the size and material of the outfalls.

December 31, 2026 -MS4 Mapping and Documentation

- S5.C.4.b.ii Using available, existing data, map tree canopy to support stormwater management on Permittee-owned or operated properties. Develop and follow a methodology to intentionally identify canopy for stormwater management purposes, which may be updated annually or as needed.

December 31, 2026 -Public Education and Outreach

- S5.C.3.a.ii Document methods used to identify overburdened communities.

March 31, 2027 -Stormwater Planning & SMAP

- S5.C.1.d.i No later than March 31, 2027, complete a SMAP for at least one new high priority catchment area, or additional actions for an existing SMAP. The purpose of the SMAP is to support implementation in the SMED program with the identification of strategic investments through the identification of projects and actions.

June 30, 2027 -Operations and Maintenance

- S5.C.9.a Implement maintenance standards that are as protective of facility function as specified in the SWMMWW or an Ecology-approved Phase I program. Update maintenance standards as necessary.

June 30, 2027 -Minimum Technical Requirements for New Development & Redevelopment

- Appendix 10 Identifies the exemptions, definitions related to the Minimum Requirements, applicability of the Minimum Requirements that need to be included in the ECY-equivalent stormwater management manual.

July 1, 2027 -Operations and Maintenance

- S5.C.9.e.i Apply a street sweeping program to Permittee owned roads in high priority MS4 drainage areas discharging to outfalls and meet any of the following criteria (a) high traffic streets, such as arterials or collectors, (b) Streets that serve commercial or industrial land use areas.
- S5.C.9.e.ii Sweep high priority areas at least once between July and September each year and two additional times a year as determined by the Permittee to provide additional water quality benefits. For calendar year 2027, only one sweeping event is required.
- S5.C.9.e.ii.a Annually sweep, and document, at least 90% of high priority areas each sweeping event.
- S5.C.9.e.iii Follow equipment design performance specifications to ensure that street sweeping equipment is operated at the proper design speed with appropriate verification, and that it is properly maintained.

August 1, 2027 -Source Control Program for Existing Development

- S5.C.8.a Update and make effective the ordinances(s) or other enforceable documents, as necessary to meet S5.C.8.

December 31, 2027 -Operations and Maintenance

- S5.C.9..xv.(a) Document policies, practices, or procedures to reduce stormwater impacts associated with runoff from all lands owned or operated by the Permittee including:
 - o Source control BMPs to minimize PCBs from entering the MS4. The Permittee shall not discharge washdown water to the MS4 for buildings suspected of having PCB-containing materials.
 - o S5.C.9.xvi(a) Update policies, practices, or procedures to include source control BMPs for building materials to prevent PCBs from entering the MS4 in preparation for and during demolition and renovations.

March 31, Annually -Stormwater Management for Existing Development

- S5.C.7.b With each annual report, provide a list of planned individual projects scheduled for funding or implementation during the Permit term for the purpose of meeting the assigned equivalent acreage in Appendix 12 using the formatting specified in Appendix 12.

March 31, 2028 - Stormwater Management for Existing Development

- S5.C.7.e Report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the 2029-2034 Permit term.
- S5.C.7.c Fully fund, start construction, or completely implement projects(s) that meet the Permittee's equivalent acreage and submit documentation with the Annual Report.

March 31, 2028 -Operations and Maintenance

- S5.C.9.e.v Document and report: (a) mapped priority areas swept, (b) sweeping dates, (c) sweeping frequency, (d) type of sweeper, (e) total curb miles of priority areas and curb miles swept, and (f) approximation of street waste removed for each sweeping event.

December 31, 2028 -Stormwater Planning

- S5.C.1.c.iii Adopt and implement tree canopy goals and policies to support stormwater management.

December 31, 2028 -MS4 Mapping and Documentation

- S5.C.4.b.iii Implement a methodology to map and assess acreage of MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems that have stormwater treatment and flow controls BMPs/facilities owned or operated by the Permittee. Submit with the Annual Report a

map and breakdown of acres managed or unmanaged by stormwater treatment and flow control BMPs/facilities.

- S5.C.4.b.iv Using available, existing data map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on Permittee-owned or operated properties.

3. Stormwater Planning

3.1 Permit Requirements

The Permit (Section S5.C.1) requires the City to:

Implement a Stormwater Planning program to inform and assist in the development of policies and strategies as water quality management tools.

- Convene an inter-disciplinary team to inform and assist in the development, progress and influence of this program.
- Coordinate long-range plan updates. Describe how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the planning update processes and influencing policies and implementation strategies in Edgewood.
- Continue Low Impact Development code-related requirements to make LID the preferred and commonly used approach to site development.
- No later than December 31, 2028, adopt and implement tree canopy goals and policies to support stormwater management. Permittees shall consider how existing or future tree canopy can support stormwater management. Establish a long-term goal of canopy.
- Stormwater Management Action Planning (SMAP). Permittees shall conduct a similar process and consider the range of issues outlined in the Stormwater Management Action Planning Guidance (Ecology, 2024; Publication no. 24-10-027) for one new priority catchment or additional actions for an existing SMAP.
 - I. By March 31, 2027, Permittees shall complete and submit a SMAP for at least one new high priority catchment area, or additional actions for an existing SMAP.
 - II. A description of the stormwater facility retrofits needed for the area, including the BMP types and preferred locations.
 - III. Land management/development strategies and/or actions identified for water quality management.
 - IV. Focused, enhanced, or customized implementation of stormwater management actions related to the Permit sections within S5.

- V. Identify changes needed for local long-range plans to address SMAP priorities. • A proposed implementation schedule and budget sources for short and long-term actions. • Actions in the SMAP that may benefit overburdened communities. • A process and schedule to provide future assessment and feedback to improve the planning process.

Table 3.1 Stormwater Planning	
Ongoing	Plan for 2025
Convene an interdisciplinary team to inform and assist in the development, progress and influence of this program.	City Staff in the Engineering and Planning Departments work together to meet this requirement.
On or before March 31, 2027, the Permittee shall describe how stormwater management needs and protections/improvement of receiving water health are (or are not) informing the long-range planning process and influencing policy.	Under review.
As an ongoing effort, continue to require LID Principals and BMPs when updating, revising and developing new local development codes. Make LID the preferred and commonly used approach to site development.	The City has made LID the preferred and commonly used approach to site development per the SWMMWW standards.
By December 31, 2028, adopt and implement tree canopy goals and policies to support stormwater management.	The City is reviewing tree preservation goals.
By March 31, 2027, complete a SMAP for at least one new high priority catchment area, or additional actions for an existing SMAP.	Options for a new SMAP or additional actions on the existing SMAP are under review.

4. Public Education and Outreach

4.1 Permit Requirements

The SWMP shall include an education and outreach program designed to:

- Build general awareness about methods to address and reduce impacts from stormwater runoff.
- Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.
 - I. No later than July 1, 2025, each Permittee shall follow recommendations from the 2024 evaluate and report and follow social marketing practices and methods to develop an outreach campaign.
 - II. By September 1, 2025, each Permittee shall begin to implement the strategy developed.
 - III. No later than March 31, 2029, evaluate and submit a report on the changes in understanding and adoption of behaviors from implementation along with planned or recommended changes.
- Create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.

Table 4.1 identifies ongoing programs and activities that help Edgewood comply with the Permit, and includes specific actions planned for 2024.

Table 4.1 Public Education and Outreach: Programs and Activities

Activity	Plan for 2025
The City has discontinued its quarterly magazine and is transition to utilizing social media to disseminate information on improving water quality and capital improvement projects.	Staff will produce social media posts periodically.
The City partners with the Tacoma-Pierce County Health Department's behavior campaign for Natural Yard Care.	Webinar series set for April.
Nelson Nature Park has become a Steward Site for the Pierce Conservation District. Monthly stewardship events are scheduled to improve water quality.	The City will continue to assist with these stewardship activities.
The City monitors and participates in STORM and other regional activities such as the South Sound Phase II permittee group.	Continue to participate in regional activities

5. Public Involvement and Participation

5.1 Permit Requirements

Permittees shall provide ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, participation in developing rate-structures or other similar activities. Each Permittee shall comply with applicable state and local public notice requirements when developing elements of the SWMP and SMAP.

The minimum performance measures are:

- a. Permittees shall create opportunities for the public to participate in the decision-making processes involving the development, implementation, and update of the Permittee's SMAP and SWMP.
- b. Each Permittee shall post on their website their SWMP Plan and the annual report required under section S9.A of the permit no later than May 31 each year. All other submittals shall be available to the public upon request. To comply with the posting requirement, a Permittee that does not maintain a website may submit the updated SWMP in electronic format to Ecology for posting on Ecology's website.

5.2 Ongoing and Planned Activities for Public Involvement and Participation

Edgewood currently implements activities and programs meeting the Permit requirements. The City creates opportunities for the public to participate in the decision-making processes involving the development, implementation, and update of the City's Surface Water Management Plan (SWMP), including its Site Development Regulations. Any updates to the development code are formally noticed per the Edgewood Municipal Code (EMC) and reviewed with the Planning Commission and City Council, with opportunities to provide both informal and formal written and oral comments at Public Hearings before both groups.

6. MS4 Mapping and Documentation

6.1 Permit Requirements

The SWMP shall include an ongoing program for mapping and documenting the MS4.

The minimum performance measures are:

- a. Ongoing Mapping: Each Permittee shall maintain mapping data for the features listed below:
 - i. Known MS4 outfalls and known MS4 discharge points.
 - ii. Receiving waters, other than groundwater.
 - iii. Stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee.
 - iv. Geographic areas served by the Permittee's MS4 that do not discharge stormwater to surface waters.
 - v. 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 features or attributes (or both) shall be mapped:
 - (a) Tributary conveyance type, material, and size where known.
 - (b) Associated drainage areas.
 - (c) Land use.
 - vi. Connections between the MS4 owned or operated by the Permittee and other municipalities or public entities.
 - vii. All connections to the MS4 authorized or allowed by the Permittee after February 16, 2007.
- b. New Mapping: Each Permittee shall:
 - i. No later than March 31, 2026, submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report.
 - ii. No later than December 31, 2026, using available, existing data, map tree canopy to support stormwater management on Permittee-owned or operated properties. Develop a methodology to identify canopy for stormwater management purposes, which may be updated annually.
 - iii. No later than December 31, 2028, implement a methodology to map acreage of MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems that have stormwater and flow control BMPs/facilities, owned or operated by the Permittee. Submit with

the Annual Report a map and breakdown of acreage managed or unmanaged by stormwater treatment and flow control/BMPs/facilities.

- iv. No later than December 31, 2028, using available, existing data map overburdened communities in relation to stormwater treatment and flow control BMPs/facilities, outfalls, discharge points, and tree canopy on Permittee-owned or operated properties.

6.2 Ongoing and planned MS4 Mapping and Documentation

Edgewood will continue to update its maps and documents as new systems are installed or discovered.

Table 6.1 MS4 Mapping and Documentation	
Activity	Plan for 2025
Implement an ongoing program for mapping and documenting the MS4	The City maintains GIS based electronic mapping data for the MS4 and will continue to update the data as new information comes available.
No later than March 31, 2026, submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report.	All known outfalls are currently mapped using the standard format.
No later than December 31, 2026, using available, existing data, map tree canopy to support stormwater management on Permittee-owned or operated properties. Develop a methodology to identify canopy for stormwater management purposes, which may be updated annually.	The City is developing a plan to achieve this requirement.

7. Illicit Discharge Detection and Elimination (IDDE)

7.1 Permit Requirements

The SWMP shall include an ongoing program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4.

The minimum performance measures are:

- The program shall include procedures for reporting and correcting or removing illicit connections, spills and other illicit discharges when they are suspected or identified. The program shall also include procedures for addressing pollutants entering the MS4 from an interconnected, adjoining MS4. Illicit connections and illicit discharges must be identified through, but not limited to field screening, inspections, source control inspections, and/or monitoring information, as appropriate
- Permittees shall inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.
- Each Permittee shall implement as ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the Permittee's MS4 to the maximum extent allowable under state and federal law.
 - i. Allowable Discharges: The regulatory mechanism does not need to prohibit the following categories of non-stormwater discharges:
 - (a) Diverted stream flows
 - (b) Rising groundwater
 - (c) Uncontaminated groundwater infiltration (as defined at 40 CFR 35.2005(b)(20))
 - (d) Uncontaminated pumped groundwater
 - (e) Foundation drains
 - (f) Air conditioning condensation
 - (g) Irrigation water from agricultural sources that is comingled with urban stormwater.
 - (h) Springs
 - (i) Uncontaminated water from crawl space pumps
 - (j) Footing Drains
 - (k) Flows from riparian habitats and wetlands
 - (l) Non-stormwater discharges authorized by another NPDES or state waste discharge permit.

- (m) Discharges from emergency firefighting activities in accordance with S2 Authorized Discharges
- ii. Conditionally Allowable Discharges: The regulatory mechanism may allow the following categories of non-stormwater discharges only if the stated conditions are met:
 - (a) Discharges from potable water sources, including but not limited to water line flushing, hyperchlorinated water line flushing, fire hydrant system flushing, and pipeline hydrostatic test water. Planned discharges shall be dechlorinated to a total residual chlorine 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.
 - (b) Discharges from lawn watering and other irrigation runoff. These discharges shall be minimized through, at a minimum, public education activities (see section S5.C.1) and water conservation efforts.
 - (c) Dechlorinated swimming pool, spa and hot tub discharges. The discharges shall be dechlorinated to a total residual chlorine 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. Discharges shall be thermally controlled to prevent an increase in temperature of the receiving water. Swimming pool cleaning wastewater and filter backwash shall not be discharged to the MS4.
 - (d) Street and sidewalk wash water, water used to control dust, and routine external building wash-down that does not use detergents. The Permittee shall reduce these discharges through, at a minimum, public education activities (see section S5.C.1) and/or water conservation efforts. To avoid washing pollutants into the MS4, Permittees shall minimize the amount of street wash and dust control water used.
 - (e) Other non-stormwater discharges. The discharges shall be in compliance with the requirements of a pollution prevention plan reviewed by the Permittee, which addresses control of such discharges.
- iii. The Permittee shall 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. The ordinance or other regulatory mechanism shall include escalating enforcement procedures and actions.

- Each Permittee shall implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the Permittee's MS4. The program shall include the following components.
 - i. Procedures for conducting investigations of the Permittee's MS4, including field screening and methods for identifying potential sources. These procedures may also include source control inspections. The Permittee shall implement a field screening methodology appropriate to the characteristics of the MS4 and the water quality concerns. Screening for illicit connections may be conducted using Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual (Herrera Environmental Consultants, Inc.; May 2013), or another methodology of comparable or improved effectiveness. The Permittee shall document the field screening methodology in the Annual Report
 - (a) All Permittees shall complete field screening for an average of 12% of the MS4 each year. Permittees shall annually track percentage of the MS4 screened beginning August 1, 2019.
 - ii. A publicly listed and publicized hotline or other telephone number for public reporting of spills and other illicit discharges.
 - 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 shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. Permittees shall document and maintain records of the trainings provided and the staff trained.
- Each Permittee shall implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the Permittee's MS4. The program shall include:
 - i. Procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the Permittee. Procedures shall address the evaluation of whether the discharge must be immediately contained and the 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 (including owners or operators of interconnected MS4s); notification of the property owner; technical assistance; follow-up inspections; and use of the compliance strategy developed pursuant to S5.C.5.c.iv, including escalating enforcement and legal actions if the discharge is not eliminated.
- iv. Compliance with the provisions in (i), (ii), and (iii), above, shall be achieved by meeting the following timelines:
 - (a) 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.
 - (b) 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.
 - (c) Initiate an investigation within 21 days of any 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 responsible for the connection.
 - (d) Upon confirmation of an illicit connection, use the compliance strategy in a documented effort to eliminate the illicit connection within 6 months.All known illicit connections to the MS4 shall be eliminated.

- Permittees shall train staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections, to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements or staffing. Permittees shall document and maintain records of the training provided and the staff trained.
- Recordkeeping: Each Permittee shall track and maintain records of activities conducted to meet the requirements of this Section. In the Annual Report, each Permittee shall submit data for the illicit discharges, spills and illicit connections including those that were found by, reported to, or investigated by the Permittee during the previous calendar year. The data shall include the information specified in Appendix 12 and WQWWebIDDE. Each Permittee may either use their own system or WQWWebIDDE for recording this data. Final submittals shall follow the instruction, timelines, and format as described in Appendix 12.

7.2 Ongoing and Planned IDDE Activities

Edgewood currently implements activities and programs meeting the Permit requirements. The City will continue its ongoing program designed to prevent, detect, characterize, trace and eliminate illicit connections and illicit discharges into the municipal stormwater system. Table 6.1 identifies ongoing programs and activities that help Edgewood comply with the Permit, and includes specific actions planned for this year.

Table 7.1 Illicit Discharge Detection and Elimination: Programs and Activities	
Ongoing	Plan for 2024
Maintain a map of stormwater facilities that meets Permit requirements.	GIS based maps will be updated as needed to keep them current.
Edgewood EMC 13.25 prohibits non-stormwater, illicit discharges to drainage facilities and surface waters.	No code updates planned for 2024
Maintain an enforcement strategy that emphasizes voluntary compliance with stormwater regulations. Voluntary compliance is always preferred.	Continue to encourage voluntary compliance.
Edgewood EMC 13.05 requires local source control (LSC) in accordance with the 2021 Edition of the Pierce County Stormwater Management and Site Development Manual.	Continue to enforce Edgewood Municipal Code.
Maintain a program to detect, identify and resolve illicit discharges and connections.	Continue to maintain and update program.
Maintain a publicized hotline for reporting spills and pollution.	Phone number (253-952-3299) is publicized on web page.
Maintain a training program for field staff who may observe illicit discharges and connections during the course of their duties.	Update training to include refresher training for all field staff.
Maintain a training program for staff who are responsible for identification and follow-up activities of illicit discharges and connections.	Continue to investigate training opportunities and provide training to staff.
Maintain records.	Continue to maintain records in accordance with permit requirements.

8. Controlling Runoff from New Development, Redevelopment and Construction Sites

8.1 Permit Requirements

The Permit (Section S5.C.6) requires the City to:

- Implement and enforce a program to reduce pollutants in stormwater runoff to a regulated small MS4 from new development, redevelopment and construction site activities. The program shall apply to private and public development, including transportation projects.
 - i. Each Permittee shall adopt or revise and make effective a local program, no later than June 30, 2027, that meets the requirements set forth in the Permit.
 - ii. 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 Permit conditions.
- The program shall include a permitting process with site plan review, inspection and enforcement capability to meet permit standards.
 - i. Review of all stormwater site plans for proposed development activities.
 - ii. Inspect, prior to clearing and construction, all permitted development sites that have a high potential for sediment transport as determined through plan review per Appendix 7.
 - iii. Inspection of all permitted development sites during construction to verify proper installation and maintenance of erosion and sediment controls.
 - iv. Inspection of all stormwater treatment and flow control BMPs/facilities, and catch basins, in new residential development at least twice per 12-month period with no less than 4 months between inspections, until 90% of the lots are constructed or when construction has stopped and the site is fully stabilized, to identify maintenance needs and enforcement as needed.
 - v. Inspection of all permitted development sites upon completion and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities.
 - vi. Compliance with inspection requirements shall be determined by the presence and records of an established inspection program designed to inspect all sites. Compliance during the permit term shall be determined by achieving 80% of required inspections annually.

8.2 Ongoing and Planned Activities for Controlling Runoff from New Development, Redevelopment and Construction Sites

Edgewood reviews proposed development and redevelopment site plans and reviews all proposed construction for stormwater impacts and erosion and sediment control.

Table 8.1 Controlling Runoff from New Development, Redevelopment, and Construction Sites: Programs and Activities	
Ongoing	Plan for 2025
Review development plans in accordance with 2021 Pierce County Stormwater Management and Site Development Manual and city development guidelines.	No changes proposed for 2025.
Distribute educational handouts for the development community explaining requirements. Provide in-person and phone support to help development community understand requirements.	Continue to educate and collaborate with developers about mutually beneficial practices.
Hold erosion and sediment control onsite preconstruction meetings for all projects that meet Pierce County Stormwater Management and Site Development Manual thresholds.	No changes proposed for 2025.
Conduct erosion and sediment control inspections.	No changes proposed for 2025.
Conduct stormwater site plan inspections.	No changes proposed for 2025.
Conduct stormwater site plan final inspections.	No changes proposed for 2025.
Conduct post-construction stormwater facility inspections.	No changes proposed for 2025.
Maintain enforcement strategy.	Continue voluntary/cooperative type of enforcement strategy.
Maintain recordkeeping of stormwater site plan reviews and inspections.	No changes proposed for 2025.
Ensure staff are appropriately trained for plan review, inspections and enforcement. Maintain in-house CESCL certification for stormwater inspection staff. Stormwater site plan review staff are trained in low impact development.	At a minimum, maintain current levels of training for Municipal Staff.

9. Municipal Operations and Maintenance

9.1 Permit Requirements

The Permit (Section S5.C.7) requires the City to:

Implement and document a Program to control or reduce stormwater discharges to waters of the State from areas of existing development.

- Implement stormwater facility retrofits, or tailored SWMP actions that meet criteria described in the permit.
- Annually, every year by March 31, Permittee shall provide a list of planned, individual projects scheduled for funding during this Permit term that will go toward the equivalent acreage found in Appendix 12.
- No later than March 31, 2028, then annually thereafter, Permittees shall fully fund, start construction or completely implement project(s) that meet the criteria in Appendix 12 and submit documentation with the Annual Report, due on March 31, 2028.
- Permittees may collaborate to meet a regional goal under conditions set forth in Appendix 12.
- No later than March 31, 2028, Permittees shall report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the next Permit term (2029-2032).

Table 9.1 Stormwater Management for Existing Development	
Activity	Plan for 2025
Permittees shall implement stormwater facility retrofits, or tailored SWMP actions that meet criteria described in Appendix 12.	The City has formed a team of internal and external subject matter experts to begin implementation of the SMED program.
No later than March 31 annually, permittees shall provide a list of individual projects scheduled for funding or implementation for the Permit term per requirements in Appendix 12.	Under development

No later than March 31, 2028, and annually thereafter, Permittee shall fully fund, start construction, or completely implement project(s) that meet the criteria defined in Appendix 12.	Under review
No later than March 31, 2028, the Permittee shall report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the 2029-2034 Permit term.	This will be updated annually as the project list is revised.

10. Source Control Program for Existing Development

10.1 Permit Requirements

The Permit (Section S5.C.8) requires the City to:

Implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4. The program shall include application of operational source control BMPs and, if necessary, structural BMPs. Inspection of potential pollutant generating sources at publicly and privately owned institutional and commercial sites. Application and enforcement of local ordinances at identified sites. And practices to reduce polluted runoff for the application of pesticides, herbicides and fertilizers from identified sites.

- No later than August 1, 2027, Permittees shall adopt and update to make effective an ordinance(s), or other enforceable document, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities
- Permittees shall establish an inventory that identifies publicly and privately owned institutional, commercial and industrial sites which have the potential to generate pollutants to the MS4. The inventory shall be updated every 5 years.
- Permittees shall continue an inspection program for identified sites.
- Permittees shall continue to inspect 100% of the sites identified through credible complaints.
- Permittees shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable timeframe as specified in the Permit.

- Permittees shall train staff who are responsible for implementing the source control program to conduct these activities.

10.2 Ongoing and Planned Activities for Source Control Program

Table 10.1 Stormwater Management for Existing Development	
Activity	Plan for 2025
No later than August 1, 2027, Permittees shall adopt and update and make effective an ordinance(s), or other enforceable document, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities.	Review current ordinances and update as needed.
Permittees shall establish an inventory that identifies publicly and privately owned institutional, commercial and industrial sites which have the potential to generate pollutants to the MS4. The inventory shall be updated at least once every 5 years.	Maintain and update current inventory.
Permittees shall continue to implement an inspection program for identified sites	Ongoing

11. Operations and Maintenance

11.1 Permit Requirements

The Permit (Section S5.C.9) requires the City to:

Implement and document a program to regulate maintenance activities and to conduct maintenance activities by the Permittee to prevent or reduce stormwater impacts.

- Implement maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington or a Phase I program, approved by Ecology.
 - i. No later than June 30, 2027, Permittees shall update their maintenance standards as necessary to meet the requirements of the Permit.
- Maintenance of stormwater facilities regulated by the Permittee - Verify adequate long-term O&M of stormwater treatment and flow control BMP's/facilities that are permitted and constructed pursuant to section S5.C.6 and shall be maintained in accordance with defined maintenance timelines defined in section S5.C.9.
- Maintenance of stormwater facilities owned or operated by the permittee.
- Implement practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or operated by the Permittee, and road maintenance activities under the functional control of the Permittee.
- No later than July 1, 2027, and ongoing thereafter, the Permittee shall develop and implement a street sweeping program to focus on priority areas and times during the year that would reasonably be expected to result in the maximum water quality benefits to receiving waters.
- No later than March 31, 2028, Permittee shall document, and report mapped priority areas swept, sweeping frequency, type of sweeper curb miles swept and approximate amount of waste removed.
- Implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee.
- Implement an ongoing training program for employees of the Permittee whose primary construction, operations, or maintenance job functions may impact stormwater quality.

Table 11.1 Operation and Maintenance	
Activity	Plan for 2025
No later than June 30, 2027, Permittees shall update their maintenance standards as necessary to meet the requirements of the Permit.	
No later than December 31, 2025, the Permittee must continue to inspect all catch basins and inlets owned and operated by the Permittee every two years.	The City has an ongoing inspection program and will continue with existing schedule.
No later than December 31, 2027, document practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or operated by the Permittee, and road maintenance activities under the functional control of the Permittee.	Review current practices and update.
No later than July 1, 2027, and ongoing thereafter, the Permittee shall develop and implement a street sweeping program to focus on priority areas and times during the year that would reasonably be expected to result in the maximum water quality benefits to receiving waters.	The City will continue to create sweeping program.
No later than March 31, 2028, Permittee shall document, and report mapped priority areas swept, sweeping frequency, type of sweeper curb miles swept and approximate amount of waste removed.	Documentation methods are currently under development.

12. Special Conditions

12.1 Compliance with Total Maximum Daily Load Requirements

The federal Clean Water Act requires that Ecology establish “Total Maximum Daily Loads” (TMDL) for rivers, streams, lakes, and marine waters that don’t meet water quality standards. A TMDL is a calculation of the maximum amount of a pollutant that a water body can receive and still meet water quality standards.

After the TMDL has been calculated for a given water body, Ecology determines how much each source must reduce its discharges of the pollutant in order bring the water body back into compliance with the water quality standards. TMDL requirements are included in the Permit for discharges into affected water bodies.

Stormwater discharges covered under the Permit are required to implement actions necessary to achieve the pollutant reductions called for in applicable TMDLs. Applicable TMDLs are those approved by the EPA before the issuance date of the Permit or which have been approved by the EPA prior to the issue date of the Permit or the date Ecology issues coverage under the Permit, whichever is later. In accordance with Permit condition S7 Compliance with Total Maximum Daily Load Requirements the City must comply with the following TMDL: Designate areas discharging via the MS4 to Jovita Creek as high priority areas for illicit discharge detection and elimination. Complete IDDE screening for bacteria sources in 100% of these MS4 subbasins by July 31, 2029, and implement the schedules and activities identified in S5.C.5 of the Western Washington Phase II Permit in response to any illicit discharges found. The results of all bacterial screening conducted in these sub-basins shall be included in the annual reports submitted to Ecology.

12.2 Monitoring and Assessment Permit Requirements

The NPDES Monitoring and Assessment program provides two options for Permittees. Permittees can either choose to perform the requirements of this permit section on their own or they can opt into a payment option and allow Ecology to utilize the funds for region wide studies and assessments. Edgewood elected to opt into the regional approach and allow Ecology to manage the funding.

Regional Status and Trends

- All Phase II Western Washington Municipal Permittees shall notify Ecology in writing which of the following two options for regional status and trends monitoring by December 1, 2024.
 - A. Option a – Make annual payment into a collective fund to implement a regional receiving water status and trends monitoring of small stream and marine nearshore areas. The annual payments into the collective fund are due on or before August 15 each year. Payment is due no later than December 1, 2024, for Permittees that chose this option during the 2019-2024 Permit term.

- B. Option b – Conduct stormwater discharge monitoring per the Permit requirements.

The City has elected to participate in option a.

SWMP Effectiveness and Source Identification Studies

- All Phase II Western Washington Municipal Permittees shall notify Ecology in writing which of the following two options for effectiveness and source identification studies by December 1, 2024.

- A. Option a – Make annual payment into a collective fund to implement effectiveness and source identification studies. The annual payments into the collective fund are due on or before August 15 each year. Payment is due no later than December 1, 2024, for Permittees that chose this option during the 2019-2024 Permit term.
- B. Option b – Conduct stormwater discharge monitoring per the Permit requirements.

The City has elected to participate in option a.

12.3 Reporting and Requirements

- A. No later than March 31 of each year beginning in 2020, each Permittee shall submit an annual report. The reporting period for the annual report will be the previous calendar year unless otherwise specified.

Permittees shall submit annual reports electronically using Ecology's Water Quality Permitting Portal (WQWebPortal) available on Ecology's website.

Permittees unable to submit electronically through Ecology's WQWebPortal shall contact Ecology to request a waiver and obtain instructions on how to submit an annual report in an alternative format.

- B. Each permittee is required to keep all records related to this Permit and the SWMP for at least five years.
- C. Each Permittee shall make all records related to this Permit and the Permittee's SWMP available to the public at reasonable times during business hours. The Permittee 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 Permittee for making photocopies of records.

2. The Permittee may require reasonable advance notice of intent to review records related to this permit.
- D. The annual report for cities, towns, and counties.
- Each annual report shall include the following:
1. A copy of the Permittee's current SWMP Plan, as required by S5.A.2.
 2. Submittal of the annual report form as provided by Ecology pursuant to S9.A, describing the status of implementation of the requirements of this 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 this Permit during the reporting period, or as a required submittal. Refer to Appendix 3 for annual report questions.
 4. If applicable, notice that the MS4 is relying on another governmental entity to satisfy any of the obligations under this Permit.
 5. Certification and signature pursuant to G19.D, and notification of any changes to authorization pursuant to G19.C.
 6. A notification of any annexations, incorporations or jurisdictional boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period.

12.4 Ongoing and Planned Activities for Special Conditions

Edgewood will continue to participate in the Stormwater Action Monitoring (SAM) program. Table 10.1 identifies ongoing programs and activities that help Edgewood comply with the Permit, and includes specific actions planned for 2024.

Table 11.1 Special Conditions: Programs and Activities	
Ongoing	Plan for 2025
The City will contribute to the collective fund to support the implementation of SAM.	Contribute annually to support implementation of SAM.