

CITY OF DUVALL PHASE II NPDES
STORMWATER MANAGEMENT
PROGRAM REPORT FOR 2020



Revised March 31, 2020

Prepared by:

City of Duvall Public Works

PO Box 1300

Duvall, WA 98019

TABLE OF CONTENTS

Introduction 1

Purpose 1

S2: Authorized Discharges 2

S3: Responsibilities of Permittees 2

S4: Compliance with Standards 2

S5: Stormwater Management Program for Cities, Towns, and Counties 3

S5.A: Develop & Implement a Stormwater Management Program 3

S5.B: Stormwater Management Plan Design 3

S5.C: Stormwater Management Plan 3

S6: Stormwater Management Program for Secondary Permittees 15

S7: Compliance with Total Maximum Daily Load Requirements 15

S8: Monitoring and Assessment 15

S9: Reporting Requirements 16

General Conditions 17

G1: Discharge Violations 17

G2: Proper Operation and Maintenance 17

G3: Notification of Discharge, including Spills 17

G4: Bypass Prohibited 17

G5: Right of Entry 18

G6: Duty to Mitigate 18

G7: Property Rights 18

G8: Compliance with Other Laws and Statutes 18

G9: Monitoring 18

G10: Removed Substances 19

G11: Severability 19

G12: Revocation of Coverage 19

G13: Transfer of Coverage 19

G14: General Permit Modification and Revocation 20

G15: Reporting a Cause for Modification or Revocation 20

G16. Appeals 20

G17. Penalties 20

G18. Duty to Reapply 21

G19. Certification and Signature 21

G20. Non-compliance notification 21

G21. Upsets 22

TABLES

Table 1: S5.C.2 Public Education and Outreach Activities5
Table 2: S5.C.3 Public Involvement and Participation Activities.....8
Table 3: S5.C.5 Illicit Discharge and Elimination Activities10
Table 4: S5.C.7 Municipal Operations and Maintenance Activities13
Table 5: Source Control Program Minimum Performance Measures Status.....14
Table 6: S8 Monitoring and Assessment Activities16
Table 7: LID Measures, Barriers and Methods.....2

APPENDICES

Appendix A: Low Impact Development (LID) (NPDES Phase II Permit Section S5.C.1.c)
Appendix B: Illicit Discharge Detection and Elimination Program (NPDES Phase II Permit Section S5.C.3)
Appendix C: Program to Control Runoff from New Development, Redevelopment and Construction Sites (NPDES Phase II Permit Section S5.C.4)
Appendix D: Operations and Maintenance Program to Prevent of Reduce Pollutant Runoff from Municipal Operations (NPDES Phase II Permit Section S5.C.5)
Appendix E: Public Education Program and IDDE Summary Report (NPDES Phase II Permit Section S5.A.3.b, S5.C.3.d.e)
Appendix F: Annual Report Form Checklist (NPDES Phase II Permit Section S9.D.2)

Introduction

The City of Duvall (City) Stormwater Management Plan (SWMP) was prepared to guide the City in planning, funding, and implementing a comprehensive program for addressing current and future regulatory and policy requirements for managing stormwater runoff, water quality, and flooding problems.

The Public Works Department is responsible for Surface Water Management and the National Pollutant Discharge Elimination System (NPDES) Permit implementation. Other City departments are involved in program implementation including the Planning Department, Building Department, and City Administration along with consultant and citizen comment and feedback.

Purpose

The NPDES Permit Program is intended to protect and restore surface water quality. The City was designated by the Environmental Protection Agency (EPA) as a municipal separate storm sewer system (MS4) for inclusion in the Phase II NPDES Permit Program.

Coverage under the Phase II NPDES Permit (Permit) authorizes discharge of stormwater to waters of the State of Washington in accordance with the Federal Clean Water Act. Discharges covered under this Permit must effectively prohibit non-stormwater discharges into storm sewers that discharge to surface waters and must apply controls to reduce the discharge of pollutants. The Washington State Department of Ecology (Ecology) is administering the Permit for the EPA.

The purpose of the Stormwater Management Plan is to develop and present the City's approach for addressing the many different but related regulations, adopted plans and programs, and policies that affect urban stormwater, flooding, and associated water-dependent resources. An overall stormwater plan is needed to address the interrelationships of the programs and provide efficient approaches because many of these requirements have different origins but affect the same activities. The plan must also be consistent with long-term goals, objectives and policies as outlined in the City of Duvall Comprehensive Plan, Comprehensive Stormwater Plan, and NPDES Phase II Permit requirements.

The development and annual maintenance of the SWMP is required as part of Permit compliance and annual reporting requirements of this SWMP Report (SWMPR). The City's SWMPR has been organized to reflect the structure of the August 1, 2012 Permit, modified on August 1, 2019, and addendums provided by Ecology. The SWMPR summarizes compliance for requirements within sections of the Permit including:

- Authorized Discharges (S2).
- Responsibilities of Permittees (S3).
- Compliance with Standards (S4).
- Development and implementation of a SWMP to reduce discharge of pollutants (S5.A and S5.B).
- Public Education and Outreach (S5.C.2).
- Public Involvement and Participation (S5.C.3).
- Illicit Discharge Detection and Elimination (S5.C.5).
- Controlling Runoff from New Development, Redevelopment and Construction Sites (S5.C.6).
- Municipal Operations and Maintenance (S5.C.7).
- Stormwater Management Program for Secondary Permittees (S6).
- Compliance with Total Maximum Daily Load Requirements (S7).
- Monitoring and Assessment (S8).
- Reporting Requirements (S9).
- The Annual Report Form Checklist from the previous year (S9.D.)

Various requirements are phased into effect throughout the five-year permit period that expires on July 31, 2024. The Permit requires the City to report on progress and submit related documentation on March 31st of each year during the Permit period. The annual reporting requirements include:

- Preparation of this SWMPR to demonstrate how the City has met the annual requirements and how the City plans to address future Permit requirements;
- Posting of this SWMPR on the City website; and
- Submittal of an annual report documenting Permit compliance for the previous reporting year along with supporting documentation as required.

The City is currently in compliance with the current permit and plans to comply with all future permit requirements when they come into effect.

Additional Permit information, including the Western Washington Phase II Municipal Stormwater Permit Special and General Conditions, Annual Report Form for Cities, Towns, and Counties, Acronyms and Definitions from the Permit and Guidelines for City and County Annual reports are located on Ecology's website (address below).

<https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits/Western-Washington-Phase-II-Municipal-Stormwater>.

S2: Authorized Discharges

The Permit authorizes the discharge of stormwater to surface waters and ground waters of the State from the MS4 owned or operated by the City as covered by the Permit and as summarized in this SWMPR. In accordance with Section S2 of the Permit, the City shall allow authorized and permitted discharge into the stormwater system. The Permit does not relieve entities from responsibility or liability associated with oil spills or other hazardous substance spills.

Discharge to groundwater and non-stormwater flows are restricted in accordance with Section S2 of the Permit as follows: Discharges to groundwater regulated under the Underground Injection Control Program (WAC Chapter 173-218) and other the State Water Pollution Control Act (RCW Chapter 90.48) are not covered under the permit. The permit authorizes discharge of non-stormwater flows to surface waters if:

- The discharge is authorized by a separate NPDES permit or a State Waste Discharge permit.
- The discharge is from emergency fire-fighting activities.
- The discharge is from another source that is managed by the permittee that is:
 - Relatively small or natural per S5.C.3.b (i.e. footing drains, flow from wetlands).
 - Relatively small or natural for secondary permittees per S6.D.3.b (i.e. footing drains, flow from wetlands).

S3: Responsibilities of Permittees

In accordance with Section S3 of the Permit, the City shall be responsible for compliance with the terms of the Permit as summarized in this SWMPR.

S4: Compliance with Standards

In accordance with Section S4 of the Permit, the City is responsible for compliance with the following standards as summarized within this SWMPR:

- A. The discharge of toxicants to waters of the State of Washington (State) which would violate water quality standards is prohibited.
- B. The Phase II NPDES Permit does not authorize violation of the State water quality standards.
- C. The City shall reduce the discharge of pollutants to the Maximum Extent Possible (MEP).
- D. The City shall use All Known and Reasonable methods of prevention, control and Treatment (AKART) to prevent and control pollution to waters of the State.
- E. The City shall comply with all of the applicable requirements of the Permit to meet the goals of the Clean Water Act.
- F. The City remains in compliance with S4 despite any prohibited discharges (S4.A or S4.B) provided the City undertakes the long-term water quality improvement improvements required by S4.F.
- G. Ecology may modify or revoke and reissue this General Permit in accordance with G14 – *General Permit Modification and Revocation* if Ecology becomes aware of additional control measures, management practices, or other actions beyond what is required in this Permit.

S5: Stormwater Management Program for Cities, Towns, and Counties

S5.A: Develop & Implement a Stormwater Management Program

In accordance with Section S5.A of the Permit, the City shall develop and implement a Stormwater Management Program (SWMP). This SWMP is a set of actions and activities comprising the components listed in S5.B and S5.C.1 through S5.C.5. This SWMP is designed to reduce the discharge of pollutants from the City to the maximum extent practicable and to protect water quality.

This report serves as written documentation of the SWMP and is organized in accordance with the Permit and the program components in Section S5. This report shall be updated at least annually for submittal along with the annual report to the Department of Ecology (Ecology). This SWMP includes ongoing programs for gathering, tracking, maintaining and using information to evaluate SWMP development, implementation, permit compliance, and to set priorities.

- The City has implemented cost tracking for development and implementation of each component of the SWMP using the City's Springbrook financial software system. This information will be provided upon Ecology's request.
- The City has implemented tracking of the number of inspections, official enforcement actions, training, and public outreach activities as stipulated in the individual program components.
- The Program includes internal coordination mechanisms among City Departments to eliminate barriers to compliance as required by S5.A.5.b. The coordination mechanisms apply to City fieldwork, project review, and management staff including representatives from Public Works, Engineering, Building, Project Management, and Planning Departments. Coordination mechanisms include in-house training, coordinated inspection and response, Certified Erosion & Sediment Control Lead (CESCL) certification for field staff, and coordinated review and comment of this report and the SWMP.

S5.B: Stormwater Management Plan Design

In accordance with Section S5.B of the Permit, the SWMP shall be designed to reduce the discharge of pollutants from regulated small MS4s to the MEP, meet state AKART requirements, and protect water quality.

S5.C: Stormwater Management Plan

In accordance with Section S5.C of the Permit, the SWMP shall include the components listed below:

S5.C.1: Stormwater Planning

The City 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.

- a. Convene an inter-disciplinary team to inform and assist in the development, progress and influence of this program.
- b. Coordination with long range plan updates.
- c. Low impact development code-related requirements.
- d. Stormwater Management Action Planning (SMAP).

S5.C.2: Public Education and Outreach

- 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.
- Create stewardship opportunities that encourage community engagement in addressing the impacts from stormwater runoff.

In accordance with Section S5.C.2 of the Permit, this SWMP includes a public education and outreach program aimed at residents, businesses, industries, elected officials, policy makers and employees of the City. The goal of the education program is to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.

- i. ***General Awareness:*** The City's public education and outreach program prioritizes and targets activities to specified audiences to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. To build general awareness by selecting a minimum of one target audience and one subject area from below:

General public including school age children

- General impacts to stormwater on surface waters, including impacts from impervious surfaces.
- Low impact development (LID) principles and LID best management practices (BMPs).

Engineers, contractors, developers, review staff and land use planners

- Technical standards for stormwater site and erosion control plans.
- LID principles and LID BMPs.
- Stormwater treatment and flow control BMPs/facilities.

Public Events, Brochures and Website - City personnel and our partners participate in various public events to highlight stormwater runoff health and the actions individuals can take to lessen their impact. Duvall hosts the Annual Earth and Arbor Day event which includes a stormwater booth highlighting sustainability practices, rain gardens and natural yard care with informative stormwater literature readily available. General communication, informational brochures and our website continue throughout the year. Puget Sound Starts Here (PSSH) regional educational materials (website, posters, logo and other media) are featured on Duvall's educational material and website. Identifying pollution and where to report it is linked on the city website and on a Hotline poster in the City Hall Kiosk and the Permit Center.

The City tracks and maintains records of public education and outreach activities. Specific activities are summarized in Appendix E of the SWMPR. General Public Education and Outreach activities, along with target audiences and status, are presented in Table 1 below.

Table 1: S5.C.2 Public Education and Outreach Activities

Activity	Target Audience	Status
Educational activities for children and adults at Earth Day and Arbor Day Festival and Public Works Open House Events	General Public / Students	On-going
Presentations to local elementary school classes	Students	On-going
<p>Ongoing utility bill inserts to reach all households within the City. Various topics including the following information:</p> <ul style="list-style-type: none"> • Landscaping and Yard Care including design, plant selection, mulch, fertilizers, pesticides, herbicides and compost/disposal. • Car washing and proper disposal of Household Waste including recycling, storm drain awareness and proper disposal for specific pollutants such as paint, hydrocarbons, and antifreeze 	General Public / Businesses	On-going
Education and outreach information and links on the City’s NPDES web page and City Facebook page	General Public / Businesses / Engineers / Contractors	On-going
Annual City-sponsored recycling event including used motor oil and household waste recycling	General Public	On-going
Collaboration with the Stormwater Outreach for Regional Municipalities (STORM) campaign	General Public / Businesses	On-going
Developing and promote natural yard care education programs through utility billing inserts, City NPDES web pages, and City Facebook page	General Public / Businesses	On-going
Continued installation of “Puget Sound Starts Here” storm drain buttons	General Public	On-going
Participated in the 2013 Preparedness Calendar that included a month dedicated to Stormwater education. The calendar was mailed to approximately 7,900 households within Duvall and the Snoqualmie Valley	General Public / Businesses	Completed in 2013
Updating and summarizing public education and outreach activities in the annual SWMPR, Appendix E	General Public	On-Going
Review and implementation of recommendations from the 2019, 2012 and 2009 Stormwater Community Outreach Reports (Elway Research, Hebert Research) that measured the public’s knowledge and practices regarding stormwater		Completed in 2009, 2012 & 2019
Develop an Illegal Dumping and Littering program including additional awareness, signage, and trash receptacles	General Public	Future
Providing additional used motor oil and hazardous waste recycling events	General Public	Future
Measurement of audiences understanding of, and improvement with respect to, stormwater and how they can improve stormwater as summarized in the 2019 Stormwater Community Awareness Report (Elway Research)	General Public	Completed in 2009, 2012 & 2019

Activity	Target Audience	Status
Updating the education and outreach program and the annual report	General Public / students	On-going
Developing additional elementary school education programs or events	Students	On-going
Additional updates of the Stormwater Community Survey Program in conjunction with other NPDES municipalities to be conducted by Elway Research, Inc.	General Public / Staff	Completed in 2019
Develop a LID education and outreach program. LID measures commonly utilized in Duvall are presented in Appendix A, "Low Impact Development (LID)"	General Public / students	On-going
Developing theme-based education events (i.e. Car Wash Awareness Month)	General Public / students	On-going
Continued collaboration with other NPDES municipalities to develop program elements and evaluation techniques	Staff	On-going
Continued collaboration with other programs and citizen groups to provide community activities, outreach and volunteer activities	General Public	On-going
Developing a Business-oriented spill education program including on-site visits and spill kit distribution	Businesses	2017 & 2019

- ii. **Behavior Change:** To affect behavior change, the City will select and focus on a minimum of one target audience and one BMP from below:

Residents, landscapers, and property managers

- Use and storage of pesticides, fertilizers, and/or other household chemicals.
- Use and storage of automotive chemicals, hazardous cleaning supplies, carwash soaps, and/or other hazardous materials.
- Prevention of illicit discharges.
- Yard care techniques protective of water quality.
- Carpet cleaning.
- Repair and maintenance BMPs for: vehicles, equipment, and/or home/buildings.
- Pet waste management and disposal.
- LID Principles and LID BMPs.
- Stormwater facility maintenance, including LID facilities.
- Dumpster and trash compactor maintenance.
- Litter and debris prevention.
- Sediment and erosion control.
- (Audience specific) Source control BMPs (refer to S5.C.8).
- (Audience specific) Locally important, municipal stormwater-related subject area. Source control BMPs and environmental stewardship actions and opportunities in the areas of pet waste, vehicle maintenance, landscaping and buffers.
- BMPs for use and storage of automotive chemicals, hazardous cleaning supplies, carwash soaps and other hazardous materials.
- Prevention of illicit discharges.

- Impacts of illicit discharges and how to report them.

Understanding and Adoption of Targeted Behaviors - In November 2019 the City of Duvall and five other Puget Sound cities participated in a regional study to assess understanding and adoption of targeted stormwater behaviors. The study was completed by Elway Research, Inc. to measure Duvall-specific and regional public stormwater knowledge and practices. The 2019 study was based on similar studies in Duvall completed by Hebert Research, Inc. in 2009 and 2012. Comparing the results of the studies provides a statistical basis for measuring the understanding and adoption of the targeted behaviors. These results are used by the City to select target behaviors, measure change in targeted behaviors, and revise and direct education and outreach resources to best improve the targeted behaviors. Updates to Duvall-specific and/or regional public surveys are anticipated to continue the long-term evaluation of targeted behaviors and comply with future permit requirements. The 2019 report is available on the City website here: <https://www.duvallwa.gov/DocumentCenter/View/6217>.

- iii. **Stewardship:** SWMP stewardship opportunities have been created to encourage participation in surface water protection and active incorporation of SWMP principle and goals. General residential stewardship activities such as volunteer plantings are emphasized during public venues such as Earth and Arbor Day, and other public educational events. A partnership between the City and the Riverview School District has developed to complete stormwater educational activities for elementary school children. Stewardship is also encouraged through interaction and volunteer planting/maintenance parties and storm drain marking with the Boy Scouts of America, Riverview School District students, and groups and individuals that are requesting or required to complete volunteer service hours.

S5.C.3: Public Involvement and Participation

The City 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. The City shall comply with applicable state and local public notice requirements when developing elements of the SWMP and SMAP.

General Requirements: In accordance with Section S5.C.3 of the Permit, this SWMP provides ongoing opportunities for public involvement through advisory councils, public hearings, participation in developing rate structures, stewardship programs, environmental activities and other similar activities. Section S5.C.2 requires the City to:

- a. Create opportunities for the public to participate in the decision-making process involving the development, implementation and update of the City's entire SWMP and SMAP.
- b. Make the SWMP, the Annual Permit report, and all other submittals available to the public. The City posts the latest annual report and the SWMP submitted with the latest annual report on the City's NPDES web page.

The City tracks and maintains records of Public Involvement and Participation activities. General Public Involvement and Participation activities, along with target audiences and status, are presented below in Table 2.

Table 2: S5.C.3 Public Involvement and Participation Activities

Activity	Target Audience	Status
Implementation of a public hotline comment and reporting phone number and email address posted at City Hall and the City’s NPDES web page to provide for and document public involvement and participation	General Public	On-going
Soliciting public involvement and participation using newsletter articles	General Public	On-going
Completing public notices, City Council presentations and other public presentations to collect, document and implement public feedback	General Public	
Public notice and hearing requesting review and comment of the draft annual report and SWMPR and posting of the documents on the City website with copies available at City Hall	General Public	
Posting of the latest annual report and the SWMPR submitted with the latest annual report on the City’s NPDES web page following public review and submittal to Ecology	General Public	Annually By March 31
Summarizing public involvement and participation activities in the annual report	General Public	Annually By March 31
Making the SWMPR, the annual Permit report and the all other submittals available to the public on the City’s NPDES web page	General Public	Annually By March 31
Continue support of the “Adopt-a-Road” program to promote this anti-litter and litter cleanup program	General Public	On-going
Maintain a public comment section with dedicated email link within the City’s NPDES web page to provide an on-line avenue for public involvement and participation	General Public	On-going
On-going volunteer installation of “Puget Sound Starts Here” storm drain buttons	General Public	On-going
Updating the Stormwater Community Survey Program with other NPDES municipalities conducted by Hebert Research	General Public	Completed in 2019, 2012, 2009
Develop a Neighborhood or Homeowner Association Volunteer monitoring program	General Public	Future
Developing an “Adopt a Stormwater Facility” volunteer program	General Public	Future

S5.C.4: MS4 Mapping and Documentation

In accordance with Section S5.C.4 of the Permit, the SWMP shall include an ongoing program for mapping and documenting the MS4.

a. *Ongoing Mapping:*

- 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 City.
- iv. Geographic area served by the City’s MS4 that do not discharge stormwater to surface waters.
- v. Tributary conveyance 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.

- vi. Connections between MS4 owned or operated by the City and other municipalities or public entities.
- vii. All connections to the MS4 authorized or allowed by the City after February 16, 2007.
- b. *New Mapping*:
 - i. Begin to collect size and material for all known MS4 outfalls during normal course of business (e.g. during field screening, inspection, or maintenance) and update records.
 - ii. Complete mapping of all known connections from the MS4 to a privately-owned stormwater system (no later than August 1, 2023).
- c. Required format for mapping is electronic (e.g. GIS, CAD drawings, etc.), with fully described mapping standards.
- d. To the extent consistent with national security laws and directives, the City shall make available to Ecology, upon request, available maps depicting the information required in S5.C.4.a through c, above.
- e. Upon request, and to the extent appropriate, the City shall provide mapping information to federally recognized Indian Tribes, municipalities, and other Permittees. The Permit does not preclude the City from recovering reasonable costs associated with fulfilling mapping information requests by federally recognized Indian Tribes, municipalities, and other Permittees.

S5.C.5: Illicit Discharge Detection and Elimination

In accordance with Section S5.C.5 of the Permit, this SWMP includes an ongoing program to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4.

The City's ongoing IDDE program is summarized in Appendix A of this Report. Section S5.C.5 minimum performance measures are:

- a. 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.
- b. The City shall inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.
- c. The City shall implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the City's MS4 to the maximum extent allowable under state and federal law.
- d. The City shall implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the City's MS4.
- e. The City shall implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the City's MS4.
- f. The City 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. The City shall document and maintain records of the training provided and the staff trained.
- g. Recordkeeping: The City shall track and maintain records of the activities conducted to meet the requirements of this Section. In the Annual Report, the City shall submit data for the illicit

discharges, spills and illicit connections including those that were found by, reported to, or investigated by the City during the previous calendar year.

Illicit Discharge Detection and Elimination Activities: General Illicit Discharge Detection and Elimination activities, along with target audiences and status, are presented below in Table 3.

Table 3: S5.C.5 Illicit Discharge and Elimination Activities

Activity	Target Audience	Status
Updating the GIS storm sewer map based on existing in-house information and field mapping as required	Staff, other	On-going
Updated IDDE Ordinance	General Public	Completed
Maintain an IDDE public hotline posted at City Hall and the City's NPDES web page	General Public	On-going
Maintain a non-emergency email reporting link within the City's NPDES web page	General Public	On-going
Implementation of an "Illicit Discharge Detection and Elimination Program" summarized in Appendix B of this Report	Staff	On-going
Complete on-going investigations and field screening	Staff	On-going
Additional IDDE public outreach	General Public	On-going

S5.C.6: Controlling Runoff from New Development, Redevelopment, and Construction Sites

In accordance with Section S5.C.6 of the Permit, this SWMP will 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.

The City program to control runoff is summarized in Appendix D of this Report. Section S5.C.6 minimum performance measures are:

- a. Implement an ordinance or other enforceable mechanism or program that addresses runoff from new development, redevelopment and construction site Projects. The City adopted Stormwater Ordinance No. 1090 on August 13, 2009 and updated and adopted Stormwater Ordinance 1214 on February 21, 2017.
- b. The ordinance or other enforceable mechanism shall include, at a minimum:
 - i. The Minimum Requirements, thresholds, and definitions in Appendix 1, or the 2013 Appendix 1 amended to include the changes identified in Appendix 10, or Phase I program approved by Ecology and amended to include Appendix 10, for new development, redevelopment, and construction sites. Adjustment and variance criteria equivalent to those in Appendix 1 shall be included. More stringent requirements may be used, and/or certain requirements may be tailored to local circumstances through the use of Ecology-approved basin plans or other similar water quality and quantity planning efforts. Such local requirements and thresholds shall provide equal protection of receiving waters and equal levels of pollutant control to those provided in Appendix 1.

- ii. The local requirements shall include the following requirements, limitations, and criteria that, when used to implement the minimum requirements in Appendix 1 (or program approved by Ecology under the 2019 Phase I Permit) will 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 shall document how the criteria and requirements will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy State AKART requirements.

- 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 this Section that discharge to the City's MS4
- c. Include a permitting process with site plan review, inspection and enforcement capability to meet the standards listed in (i) through (iv) in section S5.6.c, for both private and public projects, using qualified personnel (as defined in *Definitions and Acronyms*).
- d. Make available copies of the "Notice of Intent for Construction Activity" and the "Notice of Intent for Industrial Activity". Upon request, the City can provide links to the information on the stormwater website page and shall continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater permits that are issued by Ecology.
- e. Ensure that all staff whose primary job duties are 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 must be provided as needed to address changes in procedures, techniques or staffing. The City maintains a spreadsheet tracking all staff training.

S5.C.7: Municipal Operations and Maintenance

In accordance with Section S5.C.7 this SWMP shall implement and document a program to regulate maintenance activities and to conduct maintenance activities by the City to prevent or reduce stormwater impacts.

The City program to control runoff is summarized in Appendix D of this Report. Section S5.C.7 minimum performance measures are:

- a. 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. For facilities which do not have maintenance standards, the City shall develop a maintenance standard.
- b. Maintenance of stormwater facilities regulated by the City:
 - i. Includes provisions to verify adequate long-term O&M of stormwater treatment and flow control BMPs/facilities that are permitted and constructed pursuant to S5.C.6.c and shall be maintained in accordance with S5.C.7.a.

The provisions shall include:

- (a) Implementation of an ordinance or other enforceable mechanism that:
 - Clearly identifies the party responsible for maintenance in accordance with maintenance standards established under S5.C.7.a.
 - Requires inspection of facilities in accordance with the requirements in (b), below.
 - Establishes enforcement procedures.
- (b) Annual inspections of all stormwater treatment and flow control BMPs/facilities that discharge to the MS4 and were permitted by the City according to S5.C.6.c, including those permitted in accordance with requirements adopted pursuant to the 2007-2019 Ecology municipal stormwater permits, unless there are maintenance records to justify a different frequency.
- ii. Compliance with the inspection requirements in (b), above, shall be determined by the presence and records of an established inspection program designed to inspect all facilities, and achieving at least 80% of required inspections.
- iii. The program shall include 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 shall be maintained.
- c. Maintenance of stormwater facilities owned or operated by the City.
 - i. The City shall implement a program to annually inspect all municipally owned or operated stormwater treatment and flow control BMPs/facilities and taking appropriate maintenance actions in accordance with the adopted maintenance standards.
 - ii. The City shall spot check potentially damaged stormwater treatment and flow control BMPs/facilities after major storm events (24-hour storm event with a 10 year or greater recurrence interval). If spot checks indicate widespread damage/maintenance needs, inspect all stormwater treatment and flow control BMPs/facilities that may be affected. Conduct repairs or take appropriate maintenance action in accordance with maintenance standards established above, based on the results of the inspections.
 - iii. The City shall inspect all catch basins and inlets owned or operated by the City every two years. Clean catch basins if the inspection indicates cleaning is needed to comply with maintenance standards established in the *Stormwater Management Manual for Western Washington*. Decant water shall be disposed of in accordance with Appendix 6 – *Street Waste Disposal*.
 - iv. Compliance with the inspection requirements in S5.C.7.c.i-iii, above, shall be determined by the presence of an established inspection program achieving at least 95% of required inspections.
- d. Implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City, and road maintenance activities under the functional control of the City include, but are not limited to: streets, parking lots, roads, highways,

buildings, parks, open space, road rights-of-way, maintenance yards, and stormwater treatment and flow control BMPs/facilities.

- e. Implement an ongoing training program for employees whose primary construction, operations, or maintenance job functions may impact stormwater quality. The training program shall address the importance of protecting water quality, operation and maintenance standards, inspection procedures, relevant SWPPPs, selecting appropriate BMPs, ways to perform their job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns. The City shall document and maintain records of training provided. The staff training records to be kept include dates, activities or course descriptions, and names and positions of staff in attendance.
- f. Implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the City in areas subject to this Permit that are not required to have coverage under the *Industrial Stormwater General Permit* or another NPDES permit that authorizes stormwater discharges associated with the activity. As necessary, update SWPPPs no later than December 31, 2022, to include the following information.
- g. Maintain records of the activities conducted to meet the requirements of this section.

Table 4: S5.C.7 Municipal Operations and Maintenance Activities

	Activity	Status
a.	Compliance with the City adopted King County Surface Water Design Manual. Update Maintenance Standards as required.	No later than June 30, 2022
b.	Annual inspections and required maintenance of stormwater treatment and flow control facilities regulated by the City.	On-going
c.	Annual inspections and maintenance of stormwater treatment and flow control facilities owned by the City. Spot check inspection of stormwater treatment or flow control facilities following major storm events. Annual catch basin cleaning program.	On-going
d.	Implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the City, and road maintenance activities under the functional control of the City.	No later than Dec. 31, 2022
e.	Operations, maintenance and BMP training for the field crew. Implementing an on-going training program for maintenance staff with job functions that may impact stormwater quality.	On-going
f.	Updating the SWPPP for heavy equipment maintenance or storage yards and material storage facilities owned or operated by the City.	On-going
g.	Recording inspections and maintenance or repair activities using the GIS based Asset Management software in conjunction with the storm sewer map from Permit Section S5.C.3.	Developing & on-going

S5.C.8: Source Control Program for Existing Development

- a. This SWMP shall implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4.

- i. Application of operational source control BMPs / facilities, or both, to pollution generating sources associated with existing land uses and activities.
 - ii. Inspections of pollutant generating sources at publicly and privately owned institutional, commercial and industrial sites to enforce implementation of required BMPs to control pollution discharging into the MS4.
 - iii. Application and enforcement of local ordinances at sites, identified pursuant to S5.C.8.b.ii, including sites with discharges authorized by separate NPDES permit.
 - iv. Practices to reduce polluted runoff from the application of pesticides, herbicides, and fertilizers from the sites identified in the inventory.
- b. Section S5.C.8 minimum performance measures are:
- i. The City shall adopt and make effective an ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities.
 - ii. The City 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.
 - iii. The City shall implement an inspection program for sites identified pursuant to S5.C.8.b.ii, above.
 - iv. The City shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period as specified in the Permit section S5.C.8.b.iv(a) through (d).
 - v. The City shall train staff who are responsible for implementing the source control program to conduct these activities. The ongoing training program shall cover the legal authority for source control, source control BMPs and their proper application, inspection protocols, lessons learned, typical cases, and enforcement procedures. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staff. The City shall document and maintain records of the training provided and the staff trained.

Table 5 below outlines deadlines for minimum performance measures criteria of Section S5.C.8.b.

Table 5: S5.C.8 Source Control Program Minimum Performance Measures Status

	Activity	Status
i.	Adopt and make effective an ordinance or other enforceable document requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities	No later than Aug. 1, 2022
ii.	Establish an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4.	No later than Aug. 1, 2022
iii.	Implement an inspection program for sites identified pursuant to S5.C.8.b.ii (above).	No later than Jan. 1, 2023
iv.	Implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period.	No later than Jan. 1, 2023
v.	Train staff who are responsible for implementing the source control program to conduct these activities.	On-going

S6: Stormwater Management Program for Secondary Permittees

Requirements from Section S6 of the Permit apply to all Secondary Permittees and all New Secondary Permittees. This section does not apply to the City because the City is a Primary Permittee and there are no secondary permittees to the City.

S7: Compliance with Total Maximum Daily Load Requirements

Total Maximum Daily Load (TMDL) requirements from Section S7 of the Permit do not apply to the City because there are no TMDL's listed for the City within Appendix 2 of the Permit.

S8: Monitoring and Assessment

General Requirements

In accordance with Section S8 of the Permit, the City is responsible for compliance with the following monitoring requirements:

A. Regional Status and Trends Monitoring

1. All Permittees that chose S8.B Status and Trends Monitoring Option #1 in the *Phase II Western Washington Municipal Stormwater Permit*, August 1, 2013 – July 31, 2018 (extended to July 31, 2019), shall make a one-time payment into the collective fund to implement regional small streams and marine nearshore areas status and trends monitoring in Puget Sound. This payment is due on or before December 1, 2019. Submit payment according to Section S8.D, below.
2. All City and County Permittees covered under the *Phase II Western Washington Municipal Stormwater Permit*, August 1, 2013 – July 31, 2018 (extended to July 31, 2019), except the Cities of Aberdeen and Centralia, shall notify Ecology in writing which of the following two options for regional status and trends monitoring (S8.A.2.a or S8.A.2.b) the Permittee chooses to carry out during this permit term. The written notification with G19 signature is due to Ecology no later than December 1, 2019.

The City selected to participate in the RSMP to satisfy this requirement and notified Ecology prior to the deadline.

B. Stormwater Management Program (SWMP) Effectiveness and Source Identification Studies

1. All Permittees that chose S8.C Effectiveness Studies Option #1 in the *Phase II Western Washington Municipal Stormwater Permit*, August 1, 2013 – July 31, 2018 (extended to July 31, 2019), shall make a one-time payment into the collective fund to implement effectiveness studies and source identification studies. The payment is due on or before December 1, 2019. Submit payment according to Section S8.D, below.
2. All City and County Permittees covered under the *Phase II Western Washington Municipal Stormwater Permit*, August 1, 2013 – July 31, 2018 (extended to July 31, 2019), shall notify Ecology in writing which of the following two options (S8.B.2.a or S8.B.2.b) for effectiveness and source identification studies the Permittee chooses to carry out during this permit term. The written notification with G19 signature is due to Ecology no later than December 1, 2019.

The City selected to participate in the RSMP Effectiveness Studies Option #1 to satisfy this requirement and notified Ecology prior to the deadline.

3. All Permittees shall provide information as requested for effectiveness and source identification studies that are under contract with Ecology as active Stormwater Action Monitoring (SAM) projects. These requests will be limited to records of SWMP activities and associated data tracked and/or maintained in accordance with S5 – Stormwater Management Program for

Cities, Towns, and Counties and/or S9 – Reporting Requirements. A maximum of three requests during the permit term from the SAM Coordinator will be transmitted to the Permittee’s permit coordinator via Ecology’s regional permit manager. The Permittee shall have 90 days to provide the requested information.

C. Stormwater discharge monitoring.

The City selected to participate in the RSMP to satisfy requirements of this section and therefore did not participate in S8.C.

D. Payments into the collective funds.

1. All Permittees S8.A and S8.B payment amounts are listed in Appendix 11 and in the invoices that will be sent to the Permittee approximately three months in advance of each payment due date.
2. Mail payments according to the instruction in the invoice, or via United States Postal Service to:

Department of Ecology Cashiering Unit
PO Box 47611
Olympia, WA 98405-7611

Table 6: S8 Monitoring and Assessment Activities

	Activity	Status
A.	Completing SWMP status and trends monitoring, effectiveness monitoring, and source identification and diagnostic monitoring as part of the Regional Stormwater Monitoring Program	On-going
B.	Completing SWMP status and trends monitoring, effectiveness monitoring, and source identification and diagnostic monitoring as part of the Regional Stormwater Monitoring Program	On-going
C.	Summarizing monitoring activities in the annual report. Currently, no stormwater sampling or monitoring activities are being completed by the City.	NA

S9: Reporting Requirements

The City is complying with the following reporting requirements in accordance with Section S9 of the Permit:

- A. No later than March 31 of each year beginning in 2020, the City shall submit an annual report. The reporting period for the annual report will be the previous calendar year unless otherwise specified.
- B. The City is required to keep all records related to this Permit and the SWMP for at least five years.
- C. The City shall make all records related to this Permit and the City’s 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.
- D. The annual report for cities, towns, and counties

Each annual report shall include the following:

1. A copy of the City’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 City's geographic area of permit coverage during the reporting period.

E. Annual Report for Secondary Permittees: does not apply

General Conditions

G1: Discharge Violations

All discharges and activities authorized by this Permit shall be consistent with the terms and conditions of this Permit.

G2: Proper Operation and Maintenance

The City shall at all times properly operate and maintain all facilities and systems of collection, treatment, and control (and related appurtenances) which are installed or used by the City for pollution control to achieve compliance with the terms and conditions of this Permit.

G3: Notification of Discharge, including Spills

If the City has knowledge of a discharge, including spills, into or from a MS4 which could constitute a threat to human health, welfare, or the environment, the City shall:

- A. Take appropriate action to correct or minimize the threat to human health, welfare and/or the environment.
- B. Notify the Ecology regional office and other appropriate spill response authorities immediately but in no case later than within 24 hours of obtaining that knowledge.
- C. Immediately report spills or other discharges which might cause bacterial contamination of marine waters, such as discharges resulting from broken sewer lines and failing onsite septic systems, to the Ecology regional office and to the Department of Health, Shellfish Program.
- D. Immediately report spills or discharges of oils or hazardous substances to the Ecology regional office and to the Washington Emergency Management Division at 1-800-258-5990.

G4: Bypass Prohibited

The intentional bypass of stormwater from all or any portion of a stormwater treatment BMP whenever the design capacity of the treatment BMP is not exceeded, is prohibited unless the following conditions are met:

G5: Right of Entry

The City shall allow an authorized representative of Ecology, upon the presentation of credentials and such other documents as may be required by law at reasonable times.

G6: Duty to Mitigate

The City shall take all reasonable steps to minimize or prevent any discharge in violation of this Permit which has a reasonable likelihood of adversely affecting human health or the environment.

G7: Property Rights

This Permit does not convey any property rights of any sort, or any exclusive privilege.

G8: Compliance with Other Laws and Statutes

Nothing in the Permit shall be construed as excusing the City from compliance with any other applicable federal, state, or local statutes, ordinances, or regulations.

G9: Monitoring

A. Representative Sampling

Samples and measurements taken to meet the requirements of this Permit shall be representative of the volume and nature of the monitored discharge, including representative sampling of any unusual discharge or discharge condition, including bypasses, upsets, and maintenance-related conditions affecting effluent quality.

B. Records Retention

The City shall retain records of all monitoring information, including all calibration and maintenance records and all original recordings for continuous monitoring instrumentation, copies of all reports required by this Permit, and records of all data used to complete the application for this Permit, for a period of at least five years. This period of retention shall be extended during the course of any unresolved litigation regarding the discharge of pollutants by the City or when requested by the Ecology. On request, monitoring data and analysis shall be provided to Ecology.

C. Recording of Results

For each measurement or sample taken, the City shall record the following information: (1) the date, exact place and time of sampling; (2) the individual who performed the sampling or measurement; (3) the dates the analyses were performed; (4) who performed the analyses; (5) the analytical techniques or methods used; and (6) the results of all analyses

D. Test Procedures

All sampling and analytical methods used to meet the monitoring requirements in this Permit shall conform to the Guidelines Establishing Test Procedures for the Analysis of Pollutants contained in 40 CFR Part 136, unless otherwise specified in this Permit or approved in writing by Ecology.

E. Flow Measurement

Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained to ensure that the accuracy of the measurements is consistent with the accepted industry standard for that type of device. Frequency of calibration shall be in conformance with manufacturer's recommendations or at a minimum frequency of at least one calibration per year. Calibration records should be maintained for a minimum of three years.

F. Lab Accreditation

All monitoring data, except for flow, temperature, conductivity, pH, total residual chlorine, and other exceptions approved by Ecology, shall be prepared by a laboratory registered or accredited under the provisions of, Accreditation of Environmental Laboratories, Chapter 173-50 WAC. Soils and hazardous waste data are exempted from this requirement pending accreditation of laboratories for analysis of these media by Ecology. Quick methods of field detection of pollutants including nutrients, surfactants, salinity, and other parameters are exempted from this requirement when the purpose of the sampling is identification and removal of a suspected illicit discharge.

G. Additional Monitoring

Ecology may establish specific monitoring requirements in addition to those contained in this Permit by administrative order or permit modification.

G10: Removed Substances

With the exception of decant from street waste vehicles, the City shall not allow collected screenings, grit, solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of stormwater to be resuspended or reintroduced to the MS4 or to waters of the State. Decant from street waste vehicles resulting from cleaning stormwater facilities may be reintroduced only when other practical means are not available and only in accordance with the Street Waste Disposal Guidelines in Appendix 6. Solids generated from maintenance of the MS4 may be reclaimed, recycled, or reused when allowed by local codes and ordinances. Soils that are identified as contaminated pursuant to Chapter 173-350 WAC shall be disposed at a qualified solid waste disposal facility (see Appendix 6).

G11: Severability

The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this Permit shall not be affected thereby.

G12: Revocation of Coverage

The director may terminate coverage under this General Permit in accordance with Chapter 43.21B RCW and Chapter 173-226 WAC. Cases where coverage may be terminated include, but are not limited to the following:

- A. A change occurs in the technology or practices for control or abatement of pollutants applicable to the category of discharges covered under the general permit.
- B. Effluent limitation guidelines or standards are promulgated pursuant to the CWA or Chapter
- C. 90.48 RCW, for the category of dischargers covered under this General Permit;
- D. A water quality management plan containing requirement applicable to the category of dischargers covered under this General Permit is approved; or
- E. Information is obtained which indicates that cumulative effects on the environment from dischargers covered under this General Permit are unacceptable.
- F. Changes in state law that reference this Permit.

G13: Transfer of Coverage

The director may require any discharger authorized by this General Permit to apply for and obtain an individual permit in accordance with Chapter 43.21B RCW and Chapter 173-226 WAC.

G14: General Permit Modification and Revocation

This General Permit may be modified, revoked and reissued, or terminated in accordance with the provisions of WAC 173-226-230. Grounds for modification, revocation and reissuance, or termination include, but are not limited to the following:

- A. A change occurs in the technology or practices for control or abatement of pollutants applicable to the category of dischargers covered under this General Permit;
- B. Effluent limitation guidelines or standards are promulgated pursuant to the CWA or Chapter 90.48 RCW, for the category of dischargers covered under this General Permit;
- C. A water quality management plan containing requirements applicable to the category of dischargers covered under this General Permit is approved; or
- D. Information is obtained which indicates that cumulative effects on the environment from dischargers covered under this General Permit are unacceptable.
- E. Changes in state law that reference this Permit.

G15: Reporting a Cause for Modification or Revocation

A Permittee who knows or has reason to believe that any activity has occurred or will occur which would constitute cause for modification or revocation and reissuance under General Condition G12, G14, or 40 CFR 122.62 must report such plans, or such information, to Ecology so that a decision can be made on whether action to modify, or revoke and reissue this Permit will be required. Ecology may then require submission of a new or amended application. Submission of such application does not relieve the Permittee of the duty to comply with this Permit until it is modified or reissued.

G16. Appeals

- A. The terms and conditions of this General Permit, as they apply to the appropriate class of dischargers, are subject to appeal within thirty days of issuance of this General Permit, in accordance with Chapter 43.21B RCW, and Chapter 173-226 WAC.
- B. The terms and conditions of this General Permit, as they apply to an individual discharger, are appealable in accordance with Chapter 43.21B RCW within thirty days of the effective date of coverage of that discharger. Consideration of an appeal of General Permit coverage of an individual discharger is limited to the General Permit's applicability or non-applicability to that individual discharger.
- C. The appeal of General Permit coverage of an individual discharger does not affect any other dischargers covered under this General Permit. If the terms and conditions of this General Permit are found to be inapplicable to any individual discharger(s), the matter shall be remanded to Ecology for consideration of issuance of an individual permit or permits.
- D. Modifications of this Permit are appealable in accordance with Chapter 43.21B RCW and Chapter 173-226 WAC.

G17. Penalties

40 CFR 122.41(a)(2) and (3), 40 CFR 122.41(j)(5), and 40 CFR 122.41(k)(2) are hereby incorporated into this Permit by reference.

G18. Duty to Reapply

The City shall apply for permit renewal at least 180 days prior to the specified expiration date of this Permit.

G19. Certification and Signature

All formal submittals to Ecology shall be signed and certified.

- A. All permit applications shall be signed by either a principal executive officer or ranking elected official.
- B. All formal submittals required by this Permit shall be signed by a person described, above, or by a duly authorized representative of that person. A person is a duly authorized representative only if:
 - 1. The authorization is made in writing by a person described, above, and submitted to Ecology, and
 - 2. The authorization specifies either an individual or a position having responsibility for the overall development and implementation of the stormwater management program. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.)
- C. Changes to authorization. If an authorization under condition G19.B.2 is no longer accurate because a different individual or position has responsibility for the overall development and implementation of the stormwater management program, a new authorization satisfying the requirements of condition G19.B.2 must be submitted to Ecology prior to or together with any reports, information, or applications to be signed by an authorized representative.
- D. Certification. Any person signing a formal submittal under this Permit shall make the following certification:

"I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that Qualified Personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for willful violations."

G20. Non-compliance notification

In the event the City is unable to comply with any of the terms and conditions of this Permit, the City must:

- A. Notify Ecology of the failure to comply with the permit terms and conditions in writing within 30 days of becoming aware that the non-compliance has occurred. The written notification must include all of the following:
 - 1. A description of the non-compliance, including dates.
 - 2. Beginning and end dates of the non-compliance, and if the compliance has not been corrected, the anticipated date of correction.
 - 3. Steps taken or planned to reduce, eliminate, or prevent reoccurrence of the non-compliance.
- B. Take appropriate action to stop or correct the condition of non-compliance.

G21. Upsets

The City must meet the conditions of 40 CFR 122.41(n) regarding “Upsets.” The conditions are as follows:

- A. Definition. “Upset” means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the Permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
- B. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology-based permit effluent limitations if the requirements of paragraph (C) of this condition are met. Any determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, will not constitute final administrative action subject to judicial review.
- C. Conditions necessary for demonstration of upset. A Permittee who wishes to establish the affirmative defense of upset must demonstrate, through properly signed contemporaneous operating logs, or other relevant evidence that:
 1. An upset occurred and that the Permittee can identify the cause(s) of the upset;
 2. The permitted facility was at the time being properly operated; and
 3. The Permittee submitted notice of the upset as required in 40 CFR 122.41(l)(6)(ii)(B) (24- hour notice of noncompliance).
 4. The Permittee complied with any remedial measures required under 40 CFR 122.41(d) (Duty to Mitigate).
- D. Burden of proof. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an upset has the burden of proof.

APPENDIX A
Low Impact Development (LID)

LOW IMPACT DEVELOPMENT (LID)

Introduction

In accordance with Section S5.C.1.c of the Permit, the City of Duvall (City) is responsible for evaluating the use of Low Impact Development (LID) measures. LID is a planning and engineering stormwater management approach applied at the parcel and subdivision scale that emphasizes conservation and use of on-site natural features integrated with engineered, small-scale hydrologic controls to more closely mimic pre-development hydrologic functions. The City will comply with the LID code-related updates including:

- i. The City adopted Stormwater Ordinance 1214 on February 21, 2017 to address this requirement. Ordinance 1214 was adopted after the December 31, 2016 deadline as summarized in the G20 Non-Compliance Notification sent to the Department of Ecology on December 29, 2016.
- ii. The City shall submit a summary of the results of the review and revision process in the annual report due no later than March 31 of each year.

The City supports the use of LID measures and requires evaluation and incorporation of the Low Impact Development Performance Standards contained in Section 4.5 of Permit Appendix 1, Minimum Technical Requirements for New Development and Redevelopment. The City uses the 2016 King County Surface Water Design Manual (KCSWDM, or as updated) to evaluate required stormwater improvements for development activities on the parcel and subdivision scale. The KCSWDM requires matching developed stormwater run-off to specific pre-developed flow conditions. The KCSWDM also encourages LID practices by awarding design credits that allow for the downsizing of flow control facilities required under King County's Core Requirement #3, Flow Control. The credits allow the designer to assume conditions that produce less runoff, thereby requiring smaller facilities. The City also requires compliance with LID requirements within Appendix 1 of the NPDES Permit.

The City's goal is to promote the use of LID measures for all development projects. This goal is being pursued by identifying, promoting and measuring LID use during the development design and permitting process. However, because of financial, physical and geotechnical constraints, there is no plan to require implementation of non-structural and LID techniques on a broader scale in the future beyond what is required in the KCSWDM or by Section 4.5 of Permit Appendix 1.

LID Practices that are currently available

All LID practices identified in Section 4.5 of Permit Appendix 1 and the KCSWDM are currently available for use within the City. Such development practices include:

- Soil Quality and Depth
- Full dispersion
- Full infiltration
- Limited infiltration
- Basic dispersion
- Bioretention
- Rain gardens
- Permeable pavement (non-grassed)
- Grassed modular grid pavement
- Rainwater harvesting
- Vegetated roofs

- Wheel strip driveways
- Minimum disturbance foundation
- Open grid decking over pervious area
- Native growth retention
- Perforated pipe connections
- Others as identified

The City has also identified potential non-structural actions and LID techniques to reduce stormwater impacts. These actions include:

- Revising the Duvall Municipal Code Section 9.06.125 (Service Charges) in 2011 to provide a stormwater fee discount for non-residential sites utilizing pervious surfacing and on-site stormwater management practices;
- Prioritization of resources for cleaning streets and catch basins; and
- Use of check dams and vegetation within open stormwater conveyances.

Possible Future Incentives to Promote LID Practices

The City supports the use of LID practices and has considered potential incentives to promote LID implementation. The City plans to evaluate possible future incentives that could include:

- Providing maximum credits and flexibility for storm water systems as allowed within Section 4.5 of Permit Appendix 1, the KCSWDM, and City codes, standards and requirements;
- Priority permit processing for projects that include LID approaches; and
- Adjustments to required landscape components to provide additional area for LID implementation.

Identified Barriers to the use of LID

The City of Duvall identified barriers to the use of LID and provides measures to address each barrier. Several of the more frequently used LID measures are not generally feasible within the City because of local geologic, topographic and hydrologic constraints. The City has identified the following barriers and methods to address each barrier in the following table:

Table 7: LID Measures, Barriers and Methods

LID Measure	Potential Barrier	Method to Address
Infiltration	- Relatively impermeable till soils	Continue to recommend that developers consider infiltration if suitable soils are present.
Dispersion	- Steep slopes - Lack of vegetated flow path	Continue to recommend that developers consider dispersion if adverse impacts from steep slopes are minimized and vegetated flow paths can be maintained.
Permeable Pavement	- Relatively impermeable till soils - Lack of longevity when compared with standard treatments - Higher maintenance and replacement costs	Continue to recommend that developers consider use of permeable pavements in low impact areas such as parking lots, trails or internal pathways.

APPENDIX B
Illicit Discharge Detection and Elimination Program and Summary Report
(NPDES Phase II Permit Section S5.C.5)

Illicit Discharge Detection and Elimination Program and Summary Report (NPDES Phase II Permit Section S5.C.5)

Summary

This section summarizes the City of Duvall Illicit Discharge Detection and Elimination Program as required by Section S5.C.5 of the NPDES Phase II Permit (Permit).

Program Requirements and Compliance

The City of Duvall Storm Water Management Plan (SWMP) includes an ongoing program to detect and remove illicit connections and discharges as defined in 40 CFR 122.26(b)(2), including any spills not under the purview of another responding authority, into the municipal separate storm sewers owned or operated by the City of Duvall. The following sections summarize the minimum performance measures for the City of Duvall Illicit Discharge Detection and Elimination Program.

Section S5.C.4: MS4 Mapping and Documentation

A municipal storm sewer system map was developed using the City's Geographic Information System (GIS) database and complies with all requirements of Permit. The map is periodically updated and improved over time.

Section S5.C.5: Illicit Discharge Detection and Elimination

A City of Duvall Illicit Discharge Detection and Elimination (IDDE) Ordinance was developed and adopted into the Duvall Municipal Code (Section 9.06.35) on August 13, 2009 (Ordinance 1090). The City of Duvall IDDE ordinance effectively prohibits non-stormwater, illicit discharges into the City's municipal separate storm sewer system (MS4) to the maximum extent allowable under State and Federal law. The IDDE Ordinance complies with all requirements of Section S5.C.5 of the NPDES Permit. The City continues to research and network with surrounding jurisdictions and the Department of Ecology to continue to improve and update these policies.

The City of Duvall has developed and implemented an ongoing program to detect and address non-stormwater discharges, including spills, and illicit connections into the City's municipal separate storm sewer system. Specific activities are described below.

- Procedures for conducting investigations of the MS4 including field screening and methods for identifying potential illicit discharge sources. The City completed field screening of at least 40% of the MS4 no later than December 31, 2017 as required by the permit.
- The City informs public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste. Appropriate information is distributed to target audiences identified pursuant to S5.C.1 as part of the City's public outreach and education effort. In addition, a publicly listed and publicized hotline telephone number for public reporting of spills and other illicit discharges has been posted at City Hall, distributed in the City's utility bill newsletter and is posted at the City's website. A record of calls received, and follow-up actions taken is documented by the City in accordance with the permit and reported in the City's annual report as required by S9 Reporting and Record Keeping Requirements.

Section S5.C.5.d: IDDE Program

The City of Duvall has implemented an ongoing program designed to address illicit discharges including spills and illicit connections. The program includes:

- Procedures for characterizing the nature of, and potential public and environmental threat posed by, an illicit discharge.
- Procedures for tracing the source of an illicit discharge.
- Procedures for eliminating the illicit discharge.
- Compliance with this provision is achieved by investigating (or referring to the appropriate agency) within 7 days, on average, any complaints, reports or monitoring information that indicates a potential illicit discharge, including spills; and immediately investigating (or referring) problems and violations determined to be emergencies or otherwise judged to be urgent or severe. The investigation procedure includes:
 - Evaluation whether the discharge must be immediately contained and steps to be taken to contain and control the discharge. Notify the Department of Ecology Emergency Spill Response hotline **(1-425-649-7000)** and emergency response if required (fire or police, dial **911**).
 - Implement corrective steps to contain and control the discharge.
 - Documentation of the reported or found illicit discharge including: the location and nature of the illicit discharge; complainant or reporting staff; investigatory staff; time, date, weather; description of illicit discharge, description of storm system; storm system map including spill location and impacts; and photographs of the site.
 - Identify source of discharge and contact responsible party. Assist in identifying measures to remove the risk of future illicit discharge and enforce corrective action in accordance with DMC 9.06.35.

Section S5.C.5.f: IDDE Training

The City of Duvall provides appropriate training for municipal field staff on the identification and reporting of illicit discharges. The annual training includes a video presentation describing IDDE identification and response, discussion of illicit discharge and spills identified during the previous 12 months, question and answer session, and lessons learned summary. The City trains all municipal field staff who are responsible for identification of, or might come into contact with or otherwise observe, an illicit discharge. Staff is trained in identification, investigation, termination, cleanup, and reporting illicit discharges including spills and illicit connections. Staff trained includes Public Works Field Staff, Planning Field Staff and Building Department Field Staff. Follow-up training is provided as needed to address changes in procedures, techniques or requirements. The City documents and maintains records of the training provided and the staff trained.

Section S5.C.5.g: Recordkeeping

The City maintains a spreadsheet tracking and recordkeeping system to track all activities conducted to meet the IDDE requirements. All Duvall activities are summarized in an Illicit Discharge Summary Report.

APPENDIX C
Program to Control Runoff from New Development, Redevelopment, and Construction Sites
(NPDES Phase II Permit Section S5.C.6)

Program to Control Runoff from New Development, Redevelopment, and Construction Sites (NPDES Phase II Permit Section S5.C.6)

Summary

This section summarizes the City of Duvall Program to Control Runoff from New Development, Redevelopment and Construction Sites as required by Section S5.C.6 of the NPDES Phase II Permit.

Program Requirements and Compliance

The City of Duvall Program to Control Runoff from New Development, Redevelopment, and Construction Sites is modeled to comply with the requirements of Section S5.C.6 of the NPDES Phase II Permit. The program applies to private and public development, including roads, and includes the “Technical Thresholds” in Appendix 1 of the Phase II NPDES Permit.

The following sections summarize the minimum performance measures for the City of Duvall Program to Control Runoff from New Development, Redevelopment, and Construction Sites.

Section S5.C.6: Runoff from New Development, Redevelopment & Construction

The Duvall Municipal Code (DMC) Section 9.06 (Stormwater Utility) addresses runoff from new development, redevelopment and construction site projects. Specific requirements and activities are described below.

- The Minimum Requirements, technical thresholds, and definitions in Appendix 1 or an equivalent approved by Ecology under the NPDES Phase I Municipal Stormwater Permit, for new development, redevelopment and construction sites.
- The City has adopted the 2016 King County Surface Water Design Manual (KCSWDM) to meet this requirement along with the Low Impact Development Performance Standards contained in Section 4.5 of Permit Appendix 1, Minimum Technical Requirements for New Development and Redevelopment.
- A site planning process and BMP selection and design criteria that, when used to implement the minimum requirements in Appendix 1 of the Permit will protect water quality, reduce the discharge of pollutants to the maximum extent practicable and satisfy the State requirement under Chapter 90.48 RCW to apply all known, available and reasonable methods of prevention, control and treatment (AKART) prior to discharge.
- The City has adopted the 2016 KCSWDM to meet this requirement along with the Low Impact Development Performance Standards contained in Section 4.5 of Permit Appendix 1, Minimum Technical Requirements for New Development and Redevelopment.
- The legal authority, through the approval process for new development, to inspect private stormwater facilities that discharge to the City’s MS4.
- The City requires the right to access, inspect, and approve private stormwater facilities as part of the permitting approval process and for maintenance as described in DMC 9.06.080 (Stormwater Utility, Inspections).

Section S5.C.6.c: Permitting Process

The City of Duvall Stormwater program includes a permitting process with plan review, inspection and enforcement capability to meet the standards listed in (i) through (vi) below, for both private and public projects, using qualified personnel (as defined in *Definitions and Acronyms* in the Phase II NPDES permit). The program applies to private and public development, including roads and includes the “Technical Thresholds” in Appendix 1 of the Phase II NPDES Permit.

Specific requirements and compliance activities are described below.

- Review of all stormwater site plans for proposed development activities.
- The City reviews all stormwater site plans for proposed development activities as part of the permitting process and as required in DMC 9.06, the 2016 KCSWDM, and the Public Works Development Design Standards.
- Inspect, prior to clearing and construction, all known development sites that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 Determining Construction Site Sediment Damage Potential.
- The City inspects all permitted development sites that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 Determining Construction Site Sediment Damage Potential. Pre-clearing inspection and documentation is completed by the Public Works Inspector for all permitted development sites.
- Inspect all known permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls. Enforce as necessary based on the inspection.
- The City inspects all permitted development sites to verify proper installation and maintenance of required erosion and sediment controls in accordance with DMC 9.06.060 (Stormwater Utility, Operation and maintenance requirements). Erosion and sediment control inspection, documentation, and enforcement is completed by the Public Works Inspector for all permitted development sites.
- Inspect 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, verify a maintenance plan is completed and responsibility for maintenance is assigned. Enforce as necessary based on the inspection.
- The City inspects all permitted development sites upon completion of construction or prior to final approval or occupancy to ensure proper installation of permanent stormwater controls such as stormwater facilities and structural BMPs. The City also verifies that a maintenance plan is completed and responsibility for maintenance is assigned. The final inspection and approval is completed and documented by the Public Works Inspector and City Engineer.
- Compliance with the inspection requirements in (ii), (iii) and (iv) above shall be determined by the presence and records of an established inspection program designed to inspect all sites. Compliance during this permit term shall be determined by achieving at least 80% of scheduled inspections.
- The City inspects all sites and documents inspections and any required and/or completed maintenance. The City will achieve at least 80% of scheduled inspections during the permit term.
- An enforcement strategy shall be developed and implemented to respond to issues of non-compliance.
- The City's stormwater facility non-compliance enforcement strategy is summarized in DMC 9.06.130 (Stormwater Utility Enforcement).

Section S5.C.6.c: Permitting Process

The program includes provisions to verify adequate long-term operation and maintenance (O&M) of post-construction stormwater facilities and BMPs that are permitted and constructed pursuant to (b) above. Specific requirements and compliance activities are described below.

- 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.

- The City identifies the responsible party and requires maintenance of and inspection of facilities in accordance with DMC 9.06.060 (Stormwater Utility, Operation and maintenance requirements).
- Each Permittee shall establish maintenance standards that are protective as or more protective of facility function than those specified in Chapter 4 of Volume V of the 2012 Stormwater Management Manual for Western Washington.
- The City utilizes existing facility maintenance plans for facilities with O&M plans. Otherwise, maintenance is completed in accordance with 2016 King County Surface Water Design Standards.
- Annual inspections of all stormwater treatment and flow control facilities (other than catch basins) permitted by the City.
- The City completes inspections and annual maintenance on all stormwater treatment and flow control facilities (other than catch basins).
- Inspections of all new flow control and water quality treatment facilities, including catch basins, for new residential developments that are a part of a larger common plan of development or sale, every 6 months until 90 percent 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.
- Public Works Inspector(s) inspects all new flow control and water quality treatment facilities, including catch basins, for new residential developments that are a part of a larger common plan of development or sale, at least every 6 months until the site is fully constructed or stabilized to identify maintenance needs and enforce compliance with maintenance standards as needed. In addition, the City Engineer and Public Works Inspector complete performance and maintenance bond inspections prior to release of performance bond (at or after final plat) and maintenance bond (two years or more after final plat). The City enforces compliance with maintenance standards as needed based on the results of the inspections.
- Compliance shall be determined by achieving at least 80% of the scheduled inspections.
- The City target is to complete 100% of inspections and actual inspection exceeds the 80% threshold.
- Unless there are circumstances beyond the City's control, when an inspection identifies an exceedance of the maintenance standard, maintenance shall 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.
 - If 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, maintenance shall be completed as soon as possible. For each exceedance of the required timeframe, the City must document the circumstances and how they were beyond their control.
- The City complies with the S5.C.4.c.vi requirement as stated.
- The 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 shall be maintained.
- The City keeps records of all projects that are approved after the effective date of this Permit.

Section S5.C.6.d Notice of Intent

The program makes 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 at City Hall, the Public Works Department, and the City Website. The City will continue to

enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology.

Training

Staff 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 is provided as needed to address changes in procedures, techniques or staffing. The City documents and maintains records of the training provided and the staff trained.

Low Impact Development Code Related Requirements

The program includes the current Low Impact Development requirements based on Section 4.5 of Permit Appendix 1, and the KCSWDM. The City adopted Stormwater Ordinance 1214 on February 21, 2017 to specifically address this requirement. Ordinance 1214 was adopted after the December 31, 2016 deadline as summarized in the G20 Non-Compliance Notification sent to the Department of Ecology on December 29, 2016.

Watershed-Scale Stormwater Planning

The permit requires jurisdiction participation, if selected, in any watershed-scale planning process led by a Phase 1 county. This requirement is not applicable to Duvall per note 25 (Page 31 of 74) of the Permit and the City knows of no other current plans for this type of county-led effort but will participate as required in possible future efforts. However, the City of Duvall completed a Watershed Plan for Duvall Urban Growth Area and adjacent drainage area (Adopted on September 15, 2015). The City has also completed a watershed-based Surface and Stormwater Management Plan update in 2018.

APPENDIX D
Operations and Maintenance Program to Prevent or Reduce Pollutant Runoff from Municipal
Operations
(NPDES Phase II Permit Section S5.C.7)

Operations and Maintenance Program to Prevent or Reduce Pollutant Runoff from Municipal Operations (NPDES Phase II Permit Section S5.C.7)

Summary

This section summarizes the City of Duvall Program for the Operations and Maintenance Program to Prevent or Reduce Pollutant Runoff from Municipal Operations as required by Section S5.C.7 of the NPDES Phase II Permit.

Program Requirements and Compliance

The City developed and implemented a Pollution Prevention and Operation and Maintenance for Municipal Operations (O&M) program that includes a training component that has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. The following sections summarize the minimum performance measures for the City of Duvall Pollution Prevention and Operation and Maintenance for Municipal Operations program.

Operations and Maintenance Standards for Stormwater Facilities

The City utilizes maintenance standards contained within the adopted King County Surface Water Design Manual (KCSWDM). Inspections are completed annually at all stormwater facilities and following significant storm events. Maintenance is performed within the following time periods:

- Within one year for typical maintenance of facilities, except catch basins.
- Within six months for catch basins.
- Within two years for maintenance that requires capital construction of less than \$25,000.
- If maintenance cannot be completed within the above time frame, then the City completes the maintenance activities as soon as possible and documents the circumstances and how they were beyond their control.

Annual Inspections for Stormwater Facilities

The City completes annual inspection of all municipally owned or operated permanent stormwater treatment and flow control facilities other than catch basins. On average, the City inspects catch basins every-other year or more frequently. Appropriate maintenance actions are completed in accordance with the City and KCSWDM requirements.

Inspections for Stormwater Facilities following Major Storm Events

The City completes spot checks of potentially damaged permanent treatment and flow control facilities (other than catch basins) after 10-year, 24-hour storms (at least 3 inches of rain in a 24-hour period based on Ecology Isopluvial maps contained within Volume III of "Stormwater Management in Western Washington) or greater storm events. If spot checks indicate widespread damage/maintenance needs, the City inspects all stormwater treatment and flow control facilities that may be affected. The City conducts repairs or takes appropriate maintenance action in accordance with maintenance standards established above, based on the results of the inspections.

Inspection of Catch Basins and Inlets

The City inspects catch basins every other year or more frequently. This inspection period complies with the Permit requirement to inspect all catch basins and inlets owned or operated by the City at least once before the end of the permit term and every two years thereafter. Catch basins are cleaned as needed to comply with maintenance standards described within the Heavy Equipment Maintenance, Storage Yards, and Material Storage Facilities SWPPP. Decant water and sediment is disposed of at an appropriate discharge facility.

Compliance with Inspection Requirements

The City inspection program complies with the inspection requirements in b, c, and d above. Compliance is completed and documented by the Public Works Department. Compliance during this permit term shall be completed by the City by achieving an annual rate of at least 95% of inspections.

Implementation of Practices to Reduce Stormwater Impacts

The City has implemented practices 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 utilizes maintenance requirements and BMPs from the City's Maintenance Yard SWPPP, the KCSWDM, Public Works Standards, and the King County Road Services - Regional Road Maintenance Endangered Species Act (ESA) Program Guidelines for the following activities:

- Pipe cleaning.
- Cleaning of culverts that convey stormwater in ditch systems.
- Ditch maintenance.
- Street cleaning.
- Road repair and resurfacing, including pavement grinding.
- Snow and ice control.
- Utility installation.
- Pavement striping maintenance.
- Maintaining roadside areas, including vegetation management.
- Dust control.
- Minimize environmental impact associated with application of fertilizers, pesticides, and herbicides.
- Sediment and erosion control.
- Landscape maintenance and vegetation disposal.
- Trash and pet waste management.
- Building exterior cleaning and maintenance.

On-Going Training Program for Employees

The City has established and implemented an on-going training program for City employees whose construction, operations or maintenance job functions may impact stormwater quality. The training program addresses the importance of protecting water quality, the requirements of the NPDES 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 is provided as needed to address changes in procedures, techniques or requirements. The City documents and maintains records of training provided.

SWPPP for Equipment Maintenance and Storage Yards

The City developed and implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards and material storage facilities owned by the City. The three Public Works facilities requiring a SWPPP, according to NPDES Permit requirements, include the Public Works Maintenance Shop, the Public Works Building Complex. The SWPPP provides information for the Implementation of non-structural BMPs including requirements, descriptions, and implementation schedule.

Records of Inspection and Maintenance or Repair Activities

The City maintains records of inspections and maintenance or repair activities conducted by the in accordance with NPDES Permit S9 Reporting Requirements. Records are maintained as part of the SWPPP for heavy equipment maintenance or storage yards and material storage facilities. Records are also maintained for training, facility inspections, operation and maintenance, and other associated activities.

Stormwater Pollution Prevention Plan link-

The SWPPP also includes periodic visual observation of discharges from the facility to evaluate the effectiveness of the BMP. The SWPPP document is available at:

<http://www.duvalwa.gov/DocumentCenter/View/343/Maintenance-Yard-Stormwater-Pollution-Prevention-Plan>.

APPENDIX E
Public Education Program and Summary Report
(NPDES Phase II Permit Section S5.C.3)

Public Education Program and Summary Report (NPDES Phase II Permit Section S5.C.3)

Summary

This report summarizes the City of Duvall Public Education Program as required by Se the NPDES Phase II Permit (Permit). The purpose of this section is to summarize the general Public Education Program and Illicit Discharge Detection and Elimination (IDDE) education efforts.

Program Requirements and Compliance

The City of Duvall Storm Water Management Plan (SWMP) includes an ongoing public education program aimed at school aged children, residents, businesses, industries, engineers, contractors, developers, elected officials, policy makers, planning staff and other City employees.

Section S5.C.3 of the Permit requires tracking of the number of inspections, official enforcement actions and types of public education activities. The Permit further require that public employees, businesses and the general public be informed of the hazards associated with the illegal discharges and improper disposal of waste.

The City documents public education and other activities including IDDE reports and inspections on several spreadsheets. These records are used to report the number of activities as required in the annual report. This report provides additional information about public education activities and IDDE reports and response.

**Appendix F: Annual Report Form Checklist
(NPDES Phase II Permit Section S9.D.2)**