

City of Clarkston 2010 Stormwater Management Plan

This 2010 SWMP is an attachment to City of Clarkston's 2009 Annual Report to the Department of Ecology for its Phase II NPDES Permit



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Serving: Asotin County



City of Asotin



City of Clarkston

Introduction

What is Stormwater?

Stormwater is rain and snow melt that runs off surfaces such as rooftops, paved streets, highways, and parking lots. As water runs off these surfaces, it can pick up pollutants such as oil, fertilizers, pesticides, soil, trash, and animal waste. From here, the water might flow directly into a local stream, river, or lake. Or, it may go into a storm drain and continue through storm pipes until it is released untreated into a local waterway.

Why is Stormwater a Problem in Washington?

Stormwater is a problem because it is often polluted and can harm human health, drinking water, and interfere with the habitat for fish and wildlife. Untreated stormwater contains toxic metals, organic compounds, and bacterial and viral pathogens. It is not safe for people to drink and is not recommended for swimming. In some areas, gravelly soils allow rapid infiltration of storm water. Untreated stormwater discharging to the ground can contaminate aquifers used for drinking water. Virtually all of our urban creeks, streams, and rivers are harmed by urban stormwater runoff.

Stormwater is the leading contributor to water quality pollution of urban waterways. In fact, about one-third of the state's waters are too polluted to meet state water quality standards – frequently stormwater is the major cause of this pollution. Urban development causes significant changes in patterns of stormwater runoff – leading to increased flooding during the wet season and decreased stream flows during the dry season.

How is Stormwater Regulated?

In 1987, Congress changed the federal Clean Water Act by declaring the discharge of stormwater from certain industries and municipalities to be a point source of pollution. Due to this change, certain stormwater discharges now require a National Pollutant Discharge Elimination System (NPDES) permit to discharge to surface waters. The U.S. Environmental Protection Agency (EPA) gave the Department of Ecology (Ecology) the authority to implement these permits in Washington State.

The EPA stormwater regulations establish two phases (Phase I and Phase II) for the stormwater permit program. Phase I was established in 1990 and requires municipalities with populations of 100,000 or greater to implement a stormwater management program as a means to control polluted discharges from stormwater systems. Phase II was established in 1999, and expands the requirement for stormwater permits to all municipalities located in urbanized areas and to construction sites between one and five acres. The cities of Asotin, Clarkston, and urbanized parts of Asotin County are considered to be part of the Clarkston Urbanized Area.

The *National Pollutant Discharge Elimination System and State Waste Discharge General Permit for Discharges from Small Municipal Separate Storm Sewers in Eastern Washington* (Phase II Permit) was issued by the Washington State Department of Ecology (Ecology) on January 17, 2007, and became effective on February 16, 2007. The permit covers a five-year period that expires on February 15, 2012. The Eastern Washington Phase II Permit can be found at the following website:

<http://www.ecy.wa.gov/programs/wq/stormwater/municipal/phaseiiEwa/ewph2permit.html>

What is a Stormwater System?

A stormwater system includes roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains designed for stormwater collection and conveyance that discharges into waters of the United States and that are owned or operated by a state, city, town, county, or other public body.

Stormwater Management Plan (SWMP)

The Phase II Permit outlines stormwater program activities and implementation milestones that permittees must follow to comply with the federal Clean Water Act (CWA). All Phase II jurisdictions are expected to develop and implement a stormwater management plan (SWMP) that includes the required activities (minimum control measures), implement those activities within the required timeframes outlined in the Phase II Permit, and submit annual reports to Ecology each year to document progress towards program implementation.

The City of Asotin, City of Clarkston and Asotin County have signed an Interlocal Cooperation Agreement to work together to implement a regional stormwater management program that is designed to meet the requirements of the Phase II permit. Through this regional approach, they hired a regional stormwater program coordinator to assist them in implementing the Phase II Permit and meeting the requirements and deadlines of the Permit.

Permit Area

The Phase II Permit requirements will be implemented in the Permit Area, which is defined as the current 20-year planning boundary as defined by the Lewis-Clark Valley Metropolitan Planning Organization (MPO). The purpose of the MPO is to look at regional transportation needs rather than looking at transportation improvements in isolation by political jurisdiction. By using the current MPO 20-year planning boundary, we can support regional goals of orderly improvement, development and growth of the communities. The current Permit Area boundary map is located on our website at http://co.asotin.wa.us/public_works_storm_water.htm.

SWMP Components

The Phase II Permit is broken down into six special conditions, or minimum control measures. The implementation and enforcement of these six components is collectively referred to as the stormwater management plan (SWMP). The six minimum control measures are:

1. Public Education and Outreach
2. Public Participation and Involvement
3. Illicit Discharge Detection and Elimination
4. Construction Site Stormwater Runoff Control
5. Post-Construction Stormwater Management for New Development and Redevelopment
6. Pollution Prevention and Good Housekeeping for Municipal Operations

In addition to these six minimum control measures, the Phase II Permit also requires the following special conditions:

- Compliance with stormwater provisions of approved Total Maximum Daily Loads (TMDLs);
- Monitoring and program evaluation; and
- Record keeping and annual reporting.

Activities identified in the SWMP are designed to reduce the discharge of pollutants from municipalities to the maximum extent practicable, to satisfy the state requirement to apply “All Known, Available, and Reasonable methods of prevention, control and Treatment” (AKART) prior to discharge, and to protect water quality. The Phase II Permit requires that specified activities from each category be completed each year in order to achieve full compliance by the end of the first permit term.

The following paragraphs describe the requirements of the Phase II Permit. Each section provides a brief overview of the regulatory requirements along with a review of past City activities and current planned activities.

It should be noted that Special Conditions S7 (Compliance with TMDLs), S8 (Monitoring and Program Evaluation), and S9 (Reporting and Record Keeping) also apply to permit holders. While compliance with these activities is not required to be included in the SWMP, they are to be addressed in the annual report to Ecology. The permit and annual reporting requirements for these conditions are described as they relate to the implementation of the City’s overall stormwater program.

In addition to the Phase II Permit, the City must also address the requirements of the state’s Underground Injection Control (UIC) program. This program, as required by the federal Safe Drinking Water Act (SDWA), is intended to protect underground sources of drinking water from contamination by waste fluids, including the infiltration of polluted stormwater. The regulatory requirements and planned activities to meet these requirements are outlined in the last section of the SWMP.

I. Public Education and Outreach—Special Condition S5.B.1

Regulatory Requirements

The City must develop and implement a formal Public Education and Outreach (PE&O) Program aimed at distributing educational materials to the community about the impacts of stormwater discharges to water bodies and the steps that can be taken to reduce pollutants in stormwater. All target audiences must be identified by February 16, 2010 and a PE&O plan must be fully developed and implemented by August 15, 2011. The following are the minimum requirements, based on land uses and target audiences found within the community:

- (1) Provide information for the general public about:
 - Improving water quality and protecting beneficial uses of waters of the state
 - Potential impacts from stormwater discharges

- Methods of avoiding, minimizing, reducing and/or eliminating adverse impacts of stormwater discharges
 - Actions individuals can take to improve water quality, including participation in local environmental stewardship activities
- (2) Provide information for businesses and the general public about:
- Preventing illicit discharges, including what constitutes illicit discharges
 - The impacts of illicit discharges
 - Promoting the proper management and disposal of toxic materials
 - Education and outreach activities associated with illicit discharges
 - Education activities to reduce the types of discharges
- (3) Provide information for engineers, construction contractors, developers, development review staff, and land use planners about:
- Technical standards
 - Development of stormwater site plans and erosion control plans
 - Stormwater BMPs for reducing adverse impacts from stormwater runoff from development sites

Year 4 Activities

- Continue to update regional stormwater website to provide information to residents about the progress of SWMP development and implementation. New information will be added throughout the year.
- Attend public events, such as the Asotin County Fair, to provide information to residents.
- Continue to engage the local media to provide updates to residents about the program.
- Identify target audiences. Develop outreach materials for schools, businesses, households and other target audiences.
- Seek opportunities to implement demonstration projects for low impact development and other stormwater conservation practices.
- Attend training opportunities whenever possible.

Year 3 Activities

- Conducted a work session to provide information to elected officials from city of Asotin, city of Clarkston and Asotin County as well as Stormwater Advisory Group members regarding updated stormwater program cost estimates, example equivalent residential unit (ERU) calculations for each entity and estimated costs per ERU.
- The regional stormwater website was updated to make information easier to access. The new website address is www.asotincountystormwater.com. New information was added throughout the year, including updates to the homeowner, illicit discharge and construction

pages.

- Mailed a post-card to City residents with information on updated website and results of the stormwater survey.
- Attended the Asotin County Fair and Alive After Five events in September and October to provide general program information to residents.
- Engaged the local media to provide updates to residents about the program. This included KLEW TV news coverage on of the illicit discharge ordinance public hearings; radio interviews on KRLC; paid advertisements announcing advisory group meetings; news articles about the illicit discharge and construction ordinances and grant awards; and legal notices advertising public hearings.
- A Public Education and Outreach plan was completed that outlines target audiences and methods to provide information to target audiences. The website will continue to be updated with information for each target audience.
- No demonstration projects for low impact development and other stormwater conservation practices were implemented, but opportunities will continue to be explored.
- Attended training sessions and/or webinars on topics including outreach, inspections, low impact development, GIS and permit implementation.

Year 2 Activities

- A regional stormwater website has been developed to provide information to the residents of Asotin County, the City of Asotin, and the City of Clarkston on the progress of SWMP development and implementation, as well as general information about stormwater, urban and rural stormwater pollution, and what the residents can do to help prevent this pollution. This website is hosted on the Asotin County website under their Public Works Department webpage and is located at http://co.asotin.wa.us/public_works_storm_water.htm.
- A stormwater survey and frequently asked questions (FAQ) were mailed to residents of the City of Clarkston in December 2008. The survey was intended to provide baseline information to the Coordinator to assist in developing and targeting an education program, identifying stormwater related problem areas in the City and prioritizing maintenance activities. The results will be published for City residents in 2009.
- A flyer was developed to provide information for engineers, construction contractors, developers, development review staff, and land use planners regarding Ecology's Construction Stormwater Permit. The flyer is available at the City of Clarkston Public Works Department. The information is also available on our website under the construction page.

- Conducted workshop for elected officials in Asotin County, City of Clarkston and City of Asotin to update them on the status of the Phase II Permit and SWMP.
- Conducted interviews with Lewiston Morning Tribune regarding the stormwater program.

2. Public Involvement and Participation—Special Condition S5.B.2

Regulatory Requirements

The City must adopt a program or policy directive to create opportunities for the public to participate in the decision making process involving the development, implementation, and update of the City’s SWMP and associated ordinances. Opportunities for public and stakeholder participation in the development and implementation of the SWMP may include attending public hearings, participation in the development and adoption of regulatory ordinances and other required program elements, participation in volunteer opportunities, or other similar activities. The Public Involvement and Participation Program implemented by the City must comply with applicable state and local public notice requirements, and must also include provisions for consideration of public comments.

Year 4 Activities

- Conduct Stormwater Advisory Group (SWAG) meetings.
- Conduct public outreach meetings to update residents on the progress of the SWMP.
- Conduct public hearings for ordinances.
- Post current SWMP to website by May 31, 2010.

Year 3 Activities

- Asotin County, City of Asotin and City of Clarkston initiated public/stakeholder involvement through the regional stormwater program by developing a Stormwater Advisory Group (SWAG). The SWAG is a diverse group of representatives of citizens, businesses, utilities, contractors, engineers, architects, school districts and non-profit groups. The SWAG met a total of nine times in 2009 and provided advisory recommendation to the regional stormwater program staff and public officials on the illicit discharge and construction ordinances.
- Conducted two public hearings on the Illicit Discharge Detection and Elimination Ordinance, No. 1456. One hearing was a joint public hearing with City of Asotin and Asotin County.
- The 2009 Stormwater Management Plan (SWMP) was posted to the website by on April 3, 2009.

Year 2 Activities

- The City has adopted a public participation policy for the development and implementation of an enhanced City stormwater management program (Resolution No. 2008-02).
- Asotin County, City of Asotin and City of Clarkston initiated public/stakeholder involvement through the regional stormwater program by developing a Stormwater Advisory Group (SWAG). The SWAG is a diverse group of representatives of citizens, businesses, utilities, contractors, engineers, architects, school districts and non-profit groups. The SWAG will provide advisory recommendations to the regional stormwater program staff and public officials.

3. Illicit Discharge Detection and Elimination—Special Condition S5.B.3

Regulatory Requirements

The City must develop, implement, and enforce a program to detect and eliminate illicit discharges into its municipal separate storm sewer system (MS4). This element of the SWMP requires that the City:

- (1) Develop and adopt an ordinance by August 16, 2009 that prohibits non-stormwater (illicit) discharges and authorizes enforcement actions.
- (2) Develop procedures for characterizing illicit discharges, spills, or illegal dumping, and procedures for tracing and removing sources of illicit discharges.
- (3) Develop a map of the MS4, showing the location of all known connections to the MS4 and outfalls to receiving waters. Beginning in 2010, one-third of the mapping must be completed by February 15 of each year with mapping being completed by February 15, 2012.
- (4) Prioritize receiving waters and conduct field assessments.
- (5) Establish a hotline for public reporting of spills and other illicit discharges and maintain records of calls and follow-up actions taken.
- (6) Provide adequate training to municipal staff.
- (7) Implement procedures for program evaluation and assessment.

Year 4 Activities

- The City will begin developing a written Illicit Discharge Detection and Elimination (IDDE) Program plan to address the inspection of outfalls, tracing sources of illicit discharges, staff training needs, field assessments, spill response and containment, tracing methods, sampling/analyzing techniques, removal methods, interface with other agencies, and program evaluation methods.
- The City installed a hotline number for residents to call with information on illicit discharges to the stormwater system. The phone number, 509-243-2071, will be advertised and included in the City's public education program.
- The City will document all phone call complaints and the follow-up activities that occurred

- The City will continue to collect information on the stormwater system and update their digital map of the MS4.

Year 3 Activities

- The Illicit Discharge Detection and Elimination (IDDE) ordinance, No. 1456 was finalized and adopted July 27, 2009.
- The City installed a hotline number for residents to call with information on illicit discharges to the stormwater system. The phone number, 509-243-2071, will be advertised and included in the City's public education program.
- No illicit discharge complaints were received.
- The City collected information on the stormwater system and updated their digital map of the MS4.

Year 2 Activities

- A consultant conducted an assessment of our current stormwater system and developed a preliminary digital map. The assessment estimated that the City had about 25% of the necessary mapping completed. The digital map will be used to confirm the locations of stormwater facilities. Additional data is also being gathered to provide better information regarding the infrastructure of our stormwater system and maintenance needs.
- A consultant developed a draft ordinance that specifically prohibits non-stormwater (illicit) discharges to the City's MS4. The draft was reviewed by City staff and legal department and will be reviewed by the SWAG prior to a recommendation going to the City Council and before publication for public input.

4. Construction Site Stormwater Runoff Control—Special Condition S5.B.4

Regulatory Requirements

The City must develop, implement, and enforce a program to reduce pollutants in stormwater runoff to its MS4 from construction activities, including private and public projects. This element of the SWMP requires that the City:

- (1) Develop and adopt an ordinance by February 16, 2010 that requires erosion and sediment controls during construction-phase work, including sanctions to ensure compliance.
- (2) Implement procedures by February 16, 2011 for site plan review, including review of Stormwater Pollution Prevention Plans (SWPPPs) prior to construction.
- (3) Implement procedures by February 16, 2011 for site inspection and enforcement of construction stormwater pollution control measures.
- (4) Provide adequate training for all permitting, planning, review, inspection, and enforcement staff.

- (5) Maintain records of activities related to site plan review, inspection, and enforcement.

Year 4 Activities

- Finalize and adopt a construction site stormwater control ordinance to reduce pollutants in stormwater runoff from new development and redevelopment projects by requiring erosion and sediment controls and other construction-phase stormwater pollution controls. The ordinance will apply to both private and public projects.
- The City will work with the SWAG to provide recommendations to the Council and will take public comments into consideration when finalizing the ordinance, consistent with the public involvement policy.
- The City will continue to provide information to engineers, contractors and developers, etc. about training available on erosion and sediment control BMPs and development of SWPPPs for construction activities through handouts and/or fliers placed on the front desk of the Building and Planning Department. Information is also available on the Stormwater page of the City's website.
- The City will provide local training opportunities for contractors, developers, etc., such as CESCL training.
- The City will develop a method for documenting site plan review, site visits, answering complaints and any enforcement action necessary.
- Enhanced training will be needed to educate staff on the new ordinances, design standards, BMPs, inspection and enforcement procedures, record keeping, etc.
- The City will finalize development fees to cover the increased costs of implementing this component. Public comments will be taken into consideration when finalizing the development fees, consistent with the public involvement policy

Year 3 Activities

- Work was started on the development of a construction site stormwater control ordinance to reduce pollutants in stormwater runoff from new development and redevelopment projects by requiring erosion and sediment controls and other construction-phase stormwater pollution controls. The ordinance will apply to both private and public projects.
- The City worked with the SWAG to provide recommendations to the Council to finalize the ordinance, consistent with the public involvement policy.
- The City continued to provide information to engineers, contractors and developers, etc. about training available on erosion and sediment control BMPs and development of SWPPPs for construction activities through handouts and/or fliers placed on the front desk of the Building and Planning Department. Information is also available on the Stormwater

- The City evaluated the option of development fees to cover the increased costs of implementing this component as part of the construction ordinance. This task will be completed in 2010 and will be finalized by resolution by the Council.

Year 2 Activities

- A flyer was developed to provide information for engineers, construction contractors, developers, development review staff, and land use planners regarding Ecology's Construction Stormwater Permit. The flyer is available at the City of Clarkston Public Works Department. The information is also available on our website under the construction page.
- Began review of construction plans and provided comments on erosion control best management practices (BMPs).
- Stormwater Program Coordinator attended Certified Erosion and Sediment Control Lead (CESCL) training through the Association of General Contractors (AGC) program.
- Stormwater Program Coordinator attended Stormwater Pollution Prevention Plan (SWPPP) training through the AGC.

5. Post-Construction Stormwater Management for New Development and Redevelopment— Special Condition S5.B.5

Regulatory Requirements

The City must develop, implement, and enforce a program to address post-construction stormwater runoff to its MS4 from both private and public new development and redevelopment projects. This element of the SWMP requires that the City:

1. Develop and adopt an ordinance by February 16, 2010 that requires post-construction stormwater controls, including requirements for runoff treatment, flow control, source control, and on-going long-term operation and maintenance of approved BMPs.
2. Implement procedures by February 16, 2011 for site plan review, including review of stormwater site plans prior to construction to ensure that plans include stormwater pollution prevention measures.
3. Implement procedures by February 16, 2011 for site inspection and enforcement of post-construction stormwater control measures.
4. Provide adequate training for staff.
5. Maintain records.

Year 4 Activities

- Finalize and adopt a post-construction stormwater management ordinance to reduce pollutants in stormwater runoff to the MS4 from new development and redevelopment projects by requiring that controls to prevent or minimize water quality impacts are in place. The ordinance will be combined with a construction site stormwater control ordinance. The ordinance will apply to both private and public projects.
- The City will work with the SWAG to provide recommendations to the Council and will take public comments into consideration when finalizing the ordinance, consistent with the public involvement policy.
- The City will continue to provide information to contractors and developers, etc. about training available on erosion and sediment control BMPs and development of SWPPPs for construction activities through handouts and/or fliers placed on the front desk of the Building and Planning Department. Information is also available on the Stormwater page of the City's website.
- The City will consider provide training opportunities locally, such as CESCL training.
- The City will develop a method for documenting site plan review, site visits, answering complaints and any enforcement action necessary.
- Enhanced training will be needed to educate staff on the new ordinances, design standards, BMPs, inspection and enforcement procedures, record keeping, etc.
- The City will finalize development fees to cover the increased costs of implementing this component. Public comments will be taken into consideration when finalizing the development fees, consistent with the public involvement policy

Year 3 Activities

- Work was started on the development of a post-construction stormwater management ordinance to reduce pollutants in stormwater runoff to the MS4 from new development and redevelopment projects by requiring that controls to prevent or minimize water quality impacts are in place. This ordinance will be combined with a construction site stormwater ordinance and will apply to both private and public projects.
- The City worked with the SWAG to provide recommendations to the Council and will take public comments into consideration when finalizing the ordinance, consistent with the public involvement policy.
- The City provided information to contractors and developers, etc. about training available on erosion and sediment control BMPs and development of SWPPPs for construction activities through handouts and/or fliers placed on the front desk of the Building and Planning Department. Information was also available on the Stormwater page of the City's website.

- The City evaluated the option of development fees to cover the increased costs of implementing this component. This task will be completed in 2010 and will be finalized by resolution by the Council.

Year 2 Activities

- A flyer was developed to provide information for engineers, construction contractors, developers, development review staff, and land use planners regarding Ecology's Construction Stormwater Permit. The flyer is available at the City of Clarkston Public Works Department. The information is also available on our website under the construction page.

6. Pollution Prevention and Good Housekeeping for Municipal Operations—Special Condition S5.B.6

Regulatory Requirements

The City must develop and implement an Operation and Maintenance Program (O&M Plan) by August 16, 2010 aimed at preventing or reducing pollutant runoff from municipal facilities and/or activities. The O&M Plan shall include appropriate pollution prevention/good housekeeping practices for various municipal operations (e.g., storm system maintenance, municipal building maintenance, parks and open space maintenance, etc.), and shall include a schedule of inspections and record keeping requirements. In addition, the City must develop and implement a formal training program for all staff whose job functions may impact stormwater quality.

Year 4 Activities

- Existing inspection and O&M activities will be enhanced to meet the regulatory requirements and will be documented in a formal O&M Plan. In addition, the SWPPP developed for the City shop will be finalized to include the remaining O&M activities (e.g., parks, municipal buildings, material and heavy equipment storage and maintenance areas, etc.). These activities will be modified as needed to protect water quality.
- A documented training program will be established.
- A record keeping program will be developed.

Year 3 Activities

- The SWPPP developed by the consultant for the City shop was finalized. The consultant provided training to all pertinent staff on how to implement the SWPPP.
- The City updated portions of the City Shop per recommendations in the SWPPP. A drying bed was installed for drying materials collected during street sweeping and an oil/water separator was purchased for the wash station, but not installed.

Year 2 Activities

- The City reviewed all municipal “industrial” facilities/sites and sought coverage under the statewide NPDES Industrial Stormwater General Permit for municipal sites meeting the criteria for coverage.
- Maintenance of the storm sewer system is currently performed on an as-needed basis and consists primarily of catch basin and system line cleaning. The City has a street maintenance program, but no pollution prevention practices are employed.
- The City performed storm system maintenance and inspection; however, the inspection and O&M activities were not documented.
- The City staff that applies pesticides, herbicides, and chemicals is state-certified through the Department of Agriculture.
- A consultant conducted an assessment of the City of Clarkston Public Works shop during August 2008, and a stormwater pollution prevention plan (SWPPP) was developed for this facility based on the site assessment. The SWPPP will be used as a template for other City facilities that may be required to have a stormwater pollution prevention plan.

Compliance with TMDL Allocations— Special Condition S7

A TMDL is scheduled to begin development on Asotin Creek in 2011. At this time the City has no TMDL requirements to meet to comply with the Permit. The City will participate in the TMDL development when it begins.

Monitoring and Program Evaluation Requirements—Special Condition S8

Regulatory Requirements

Although water sampling or other testing is not specifically required during the first permit term, the City must annually report any stormwater monitoring or studies and investigations conducted by, on behalf of, or reported to the City.

The City must also perform an annual assessment of the appropriateness of the BMPs identified for each SWMP component. Further, the City must prepare and plan to implement a future comprehensive long-term monitoring program beginning in 2010 (Year 4). Cities with populations exceeding permit-specified thresholds must create a program including the following three components:

- (1) Stormwater outfall monitoring (population greater than 10,000);
- (2) Targeted SWMP effectiveness monitoring (all cities regardless of population); and
- (3) Runoff treatment BMP effectiveness monitoring (population greater than 25,000).

Since City of Clarkston’s population is currently less than 10,000, we will only be required to create a program for targeted SWMP effectiveness monitoring. This monitoring will be designed to determine the effectiveness of the City’s SWMP at controlling stormwater related problems directly addressable by targeted actions in the SWMP.

- Develop procedure for SWMP effectiveness monitoring no later than December 31, 2010.

Year 3 Activities – None planned

Year 2 Activities – None Planned

Reporting and Record Keeping Requirements—Special Condition S9

Regulatory Requirements

The City is required to prepare and submit annual reports to Ecology. These reports must include the most current version of the City's SWMP and status of compliance with the various conditions outlined in the permit. The annual reports must include:

- (1) the status of implementation of each SWMP component;
- (2) an assessment of the City's progress in meeting the minimum performance standards;
- (3) a description of activities implemented, including the number and type of inspections, enforcement actions, PE&O activities, and illicit discharges detected and eliminated; and
- (4) other reporting requirements.

Year 4 Activities

- The City will submit the annual report and SWMP to Ecology for review by March 31, 2010.
- The SWMP will be posted to the website for access by the public by May 31, 2010.
- The City will develop and implement a formal on-going process for gathering, recording, maintaining, and using information to track the development and implementation of their SWMP as well as costs involved with implementing the Permit.

Year 3 Activities

- The City submitted the annual report and SWMP to Ecology for review on March 30, 2009.
- The SWMP was posted to the website for access by the public on April 3, 2009.
- The Stormwater Program purchased a database program for gathering, recording, maintaining, and using information to track the development of their SWMP as well as costs involved with implementing the Permit.

Year 2 Activities

- The City submitted the annual report and SWMP to Ecology for review.
- The SWMP was posted to the website for access by the public.

Underground Injection Control (UIC) Program

In addition to the Phase II Permit, the City must also address the requirements of the state's UIC program. This program, as required by the federal Safe Drinking Water Act (SDWA), is intended to protect underground sources of drinking water from contamination by waste fluids, including the infiltration of polluted stormwater.

A UIC well is a manmade subsurface fluid distribution system designed to discharge fluids into the ground and may consist of an assemblage of perforated pipes, drain tiles, or other similar mechanisms, or a dug hole that is deeper than the largest surface dimensions. The most common type of UIC well used in the City is a dry well.

All well owners must provide inventory information by registering their wells with Ecology. UIC wells constructed on or after February 3, 2006 are considered "new" wells and must be registered prior to use. UIC wells used to manage stormwater that were constructed prior to February 3, 2006 are considered "existing" wells under the UIC regulation and have different requirements than new wells. Specifically, existing wells must be registered and a well assessment must be completed to determine if they pose a high threat to groundwater. All UIC wells must meet the non-endangerment performance standard for ground water protection.

Registration and well assessment timelines for existing wells are dependent on the number of wells owned and operated by the City. Because the City owns and operates less than 50 wells, the registration and well assessment deadlines are February 3, 2009 and 2011, respectively.

Regulatory Requirements

UIC wells must be either rule-authorized or covered by a state waste discharge permit to operate. If a UIC well is rule-authorized, a permit is not required. Ecology can require corrective action or closure of a UIC well that is not in compliance. A UIC well may be rule-authorized when both of the following requirements are met:

1. A registration form must be submitted to the Department of Ecology.
2. Discharge from the UIC must not contaminate ground water. This is the "non-endangerment performance standard".

Year 4 Activities

- If the City installs dry wells in the future, the City will ensure that they are rule authorized and registered prior to use.
- Begin evaluation of dry wells that have been registered with Ecology.

Year 3 Activities

- Registered six dry wells with Ecology.

Year 2 Activities

- Began locating dry wells and collecting data.