



INFORMATIONAL MEMORANDUM

TO: Transportation and Infrastructure Services Committee
FROM: Hari Ponnekanti, Public Works Director / City Engineer
BY: Greg Villanueva, NPDES Coordinator
CC: Mayor Allan Ekberg
DATE: March 19, 2021
SUBJECT: Surface Water Fund - NPDES Program
Project No. 99341210
2020 NPDES Annual Report & 2021 Stormwater Management Program Plan

ISSUE

Review the City's 2020 National Pollutant Discharge Elimination System (NPDES) Annual Report and 2021 Stormwater Management Program (SWMP) Plan.

BACKGROUND

The NPDES Program requires the City to implement a comprehensive SWMP Plan that complies with the requirements outlined in the City's NPDES Phase II Permit. A new NPDES Phase II Permit was issued on August 1, 2019 for a five-year term. The NPDES Phase II Permit requires the City to submit an annual report and SWMP Plan by March 31 of each year to the Department of Ecology.

The NPDES Annual Report outlines the City's progress in meeting permit requirements and reflects activities completed in the previous year. The SWMP Plan forecasts activities that are relevant to the NPDES Phase II Permit. The SWMP Plan is updated annually to reflect changes and updated timelines for the Permit and to provide greater detail as various components of the permit are developed.

Once the 2020 NPDES Annual Report and the 2021 SWMP Plan are submitted to the Department of Ecology, it will be used to determine whether permit obligations are being met.

ANALYSIS

City staff has completed the 2020 NPDES Annual Report and updated the 2021 SWMP Plan. All updates to the SWMP Plan are printed in blue for reference. The 2020 NPDES Annual Report must be signed by the City Administrator and both documents electronically submitted to Department of Ecology by the reporting deadline of March 31, 2021.

FISCAL IMPACT

The program elements listed in the 2021 SWMP Plan required by the NPDES Phase II Permit have been budgeted in the Surface Water Fund and have no direct financial impact.

RECOMMENDATION

Information only.

Attachments: 2020 NPDES Annual Report
2021 Stormwater Management Program Plan



Annual Report

Category Name: General Obligations

Click the symbol next to each question number to leave an extended comment for that question. These comments do not count for answering the question.


Number	Permit Section	Question
1	S5.A	Attach a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.D.6. <input type="button" value="Choose File"/> No file chosen <input checked="" type="checkbox"/> Not Applicable
2	S5.A	Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2) <input type="button" value="Choose File"/> 2021 NPDES ... Final.docx
3	S5.A	Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP. <input checked="" type="radio"/> Yes <input type="radio"/> No
4	S5.A.5.b	Coordinated among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b) <input checked="" type="radio"/> Yes <input type="radio"/> No
4a	S5.A.5.b	Attach a written description of internal coordination mechanisms. (S5.A.5.b). <input type="button" value="Choose File"/> No file chosen Saved Document Name: Internal Coordination 2020_4a_01222021131543







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Annual Report






Category Name: Stormwater Planning

Click the  symbol next to each question number to leave an extended comment for that question. These comments do not count for answering the question.

Number	Permit Section	Question
5 	S5.C.1.	<p>Have you convened an interdisciplinary team to inform and assist in the development, progress, and influence of the comprehensive stormwater planning program? (S.5.c.1). August 1, 2020</p> <p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
6 	S5.C.1.b.i(a)	<p>List the relevant land use planning efforts that have taken place in your jurisdiction (land use plans that are used to accommodate growth, stormwater management, or transportation). (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)</p> <p>Tukwila's 2013 Surface Water Comprehensive Plan, which is scheduled to be updated this year, is currently helping guide our response to accommodate growth. In addition, Tukwila's Comprehensive Plan which includes a Natural Environment Element, Utilities Element and Transportation</p>
7 	S5.C.1.b.i(a)	<p>List of stormwater capital projects (currently in or slated for future design and construction) that resulted from this planning. (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)</p> <p><input type="button" value="Choose File"/> No file chosen Saved Document Name: PW CIP Current_7_03092021073501</p>
8 	S5.C.1.b.i(a)	<p>Describe watershed protection measures associated with stormwater management and land use planning actions that resulted from this planning. (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)</p> <p>The City Comprehensive Surface Water Plan characterized its drainage basins and watershed. As a result, surface water issues and solutions were identified. Projects were then listed for design and construction. The City also developed a proactive approach to LID. Increased</p>
9 	S5.C.1.b.i(a)	<p>Were land acquisitions identified (or are planning ahead for) that are useful for stormwater facilities to accommodate growth or to better serve an existing developed area? (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)</p> <p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
9a 	S5.C.1.b.i(a)	<p>If yes, for what purpose?</p> <p>Drainage, water quality and aquatic habitat with a strategic approach. Possible reduction in developed land surfaces which reduce impervious surface and promote infiltration, retain natural tree canopy, and restore stream buffer. See attached 2013 Surface Water Comp.</p>

Number	Permit Section	Question
10	S5.C.1.b.i(a)	<p>Identified corrective actions, in addition to the minimum requirements of the Municipal Stormwater Permits, to control or treat municipal stormwater discharges that pollute waters of the State (e.g. Limits to impervious cover added to any zoning districts, regional facility planning, minimization of vegetation loss, etc.)? (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)</p> <p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
10a	S5.C.1.b.i(a)	<p>If yes, briefly describe and list relevant plan or code sections, if applicable.</p> <p>Regulations, City policies including Surface Water Maintenance are described in the attached 2013 Surface Water Comprehensive Plan which is scheduled to be updated this year, 2021.</p> <p><input type="checkbox"/> Not Applicable</p>
11	S5.C.1.b.i(a)	<p>Updates to goals and policies related to investment in stormwater management facilities/BMPs? (yes/no) (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)</p> <p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>
12	S5.C.1.b.i(a)	<p>Does the long-range plan identify the location and existing capacity of the stormwater facilities owned or operated by the permittee and show which of those stormwater facilities have unused capacity? (yes/no) (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)</p> <p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>
12a	S5.C.1.b.i(a)	<p>Do these stormwater facility locations impact where housing, or other types of development, are projected to be located or influence the acquisition of land? (if yes, how?)</p> <p>N/A</p>
12b	S5.C.1.b.i(a)	<p>Does the long-range plan identify a lack of facilities and the potential impacts of existing or new development to those areas and receiving waters?</p> <p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>
12c	S5.C.1.b.i(a)	<p>Any new proposed locations and capacities of stormwater facilities needed for the timeframe of the plan?</p> <p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>
13	S5.C.1.b.i(a)	<p>Based on the projected population densities and distribution of growth over the planning period, describe how stormwater runoff impacts are forecasted. Does stormwater management information (including water quality) direct where growth is directed? (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)</p> <p>Tukwila is highly urbanized and approximately 90% developed. Redirection of growth is very limited. Stormwater management is not a factor in directing growth.</p>

Number	Permit Section	Question
15 	S5.C.1.c	Continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces, native vegetation loss, and stormwater runoff, where feasible? See S5.C.1.c.i. (Required annually) <input checked="" type="radio"/> Yes <input type="radio"/> No
16 	S5.C.1.c	From the assessment described in S5.C.1.c.i(a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually) <input type="radio"/> Yes <input checked="" type="radio"/> No

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Annual Report

Category Name: Public Education

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Number	Permit Section	Question
20 	S5.C.2	Did you choose to adopt one or more elements of a regional program? (S5.C.2) <input type="radio"/> Yes <input checked="" type="radio"/> No
21 	S5.C.2	Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i. <input type="button" value="Choose File"/> No file chosen Saved Document Name: 2020 Education and Outreach Ef_21_02222021133816
22 	S5.C.2	Conducted an evaluation of the effectiveness of the ongoing behavior change program and documented recommendations as outlined in S.5.C.2.a.ii(b). (Required no later than July 1, 2020) <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable
24 	S5.C.2	Began implementing strategy outlined in S.5.C.2.a.ii(c) (S5.C.2.a.ii(d) – Required by April 1, 2021) <input checked="" type="radio"/> Yes <input type="radio"/> No
26 	S5.C.2	Promoted stewardship opportunities (or partnered with others) to encourage resident participation in activities such as those described in S5.C.2.a.iii. <input checked="" type="radio"/> Yes <input type="radio"/> No
26a 	S5.C.2	Attach a list of stewardship opportunities provided. <input type="button" value="Choose File"/> No file chosen

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Annual Report

Category Name: Public Involvement

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Number	Permit Section	Question
27	S5.C.3.	Describe in Comments field the opportunities created for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation, and updates of the Permittee's SWMP and the SMAP. (S5.C.3.a) Opportunities are provided at Transportation and Infrastructure Council Committee meetings, Council Regular meetings. Input is encouraged through the year on the City's NPDES website: www.tukwila.gov/pubwks/npdes.html . Notices are also
28	S5.C.3.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b) <input checked="" type="radio"/> Yes <input type="radio"/> No
28a	S5.C.3.	List the website address in Comments field. http://www.tukwilawa.gov/dej






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Annual Report

Category Name: MS4 Mapping

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Number	Permit Section	Question
29 	S5.C.4.	Maintained a map of the MS4 including the requirements listed in S5.C.4.a.i-vii? <input checked="" type="radio"/> Yes <input type="radio"/> No
30 	S5.C.4.	Started mapping outfall size and material in accordance with S5.C.4.b.i? (Required no later than January 1, 2020) <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable
30a 	S5.C.4.	Attach a spreadsheet that lists the known outfalls' size and material(s). <input type="button" value="Choose File"/> No file chosen Saved Document Name: zone 1 river outfalls_30a_02232021081007
31 	S5.C.4.	Completed mapping connections to private storm sewers in accordance with S5.C.4.b.ii? (Required no later than August 1, 2023) <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable
32 	S5.C.4.	Developed an electronic format for map, with fully described mapping standards in accordance with S5.C.4.c? (Required no later than August 1, 2021) <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable








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Annual Report

Category Name: IDDE

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Number	Permit Section	Question
33 	S5.C.5	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste? (S5.C.5.b) <input checked="" type="radio"/> Yes <input type="radio"/> No
33a 	S5.C.5	Actions taken to inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. Tukwila has an ongoing training program for field personnel and identification, tracing, elimination, cleanup and reporting of illicit discharges, connections and elimination. Follow up training is also conducted. Businesses with a high potential for pollutant causing <input type="checkbox"/> Not Applicable
34 	S5.C.5	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c. <input checked="" type="radio"/> Yes <input type="radio"/> No
35 	S5.C.5	Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i. <input checked="" type="radio"/> Yes <input type="radio"/> No
35a 	S5.C.5	Cite field screening methodology in Comments field. The City uses GIS Surface Water mapping book to begin its investigations. Enforces its IDDE ordinance, uses local laboratory services when sampling is conducted. O&M provides video detection to storm drainage pipes and provides visual inspections during the course of a day.
36 	S5.C.5	Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.) 46 <input type="checkbox"/> Not Applicable
36a 	S5.C.5	Cite field screening techniques used to determine percent of MS4 screened. The City uses GIS Surface Water mapping book to begin its investigations. Tukwila uses the 2019 IDDE Manual and Manual Training. Enforces its IDDE ordinance, uses local laboratory services when sampling is conducted. O&M provides video detection to storm drainage pipes and

Number	Permit Section	Question
37	S5.C.5	Percentage of total MS4 screened from permit effective date through the end of the reporting year. (S5.C.5.d.i.) 46
38	S5.C.5	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.C.5.d.ii) The City's hotline telephone number is (206) 433-1860 and is publicized on the City's NPDES web page.
39	S5.C.5	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii. <input checked="" type="radio"/> Yes <input type="radio"/> No
40	S5.C.5	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e. <input checked="" type="radio"/> Yes <input type="radio"/> No
41	S5.C.5	Municipal illicit discharge detection staff are trained to conduct illicit discharge detection and elimination activities as described in S5.C.5.f. <input checked="" type="radio"/> Yes <input type="radio"/> No
42	S5.C.5	Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the Permittee as described in S5.C.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 12. <input checked="" type="checkbox"/> Import from WQWebIDDE Imported from WQWebIDDE

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Annual Report

Category Name: Runoff Controls

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Number	Permit Section	Question
43 	S5.C.6.	Implemented an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii. <input checked="" type="radio"/> Yes <input type="radio"/> No
44 	S5.C.6.	Revised ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii. (Required no later than June 30, 2022) <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable
45 	S5.C.6.	Number of adjustments granted to the minimum requirements in Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1) 0 <input type="checkbox"/> Not Applicable
46 	S5.C.6.	Number of exceptions/variances granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1) 0 <input type="checkbox"/> Not Applicable
47 	S5.C.6.	Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.6.b.i. (S5.C.6.c.i) <input checked="" type="radio"/> Yes <input type="radio"/> No
47a 	S5.C.6.	Number of site plans reviewed during the reporting period. 37
48 	S5.C.6.	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii, 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? <input checked="" type="radio"/> Yes <input type="radio"/> No
48a 	S5.C.6.	If no, inspected, prior to clearing and construction, all construction sites meeting the minimum thresholds (S5.C.6.c.ii)? <input checked="" type="radio"/> Yes <input type="radio"/> No


Number	Permit Section	Question
49	S5.C.6.	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii. <input checked="" type="radio"/> Yes <input type="radio"/> No
49a	S5.C.6.	Number of construction sites inspected per S5.C.6.c.iii. 71
49b	S5.C.6.	Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every 6 months per S5.C.6.c.iv? <input checked="" type="radio"/> Yes <input type="radio"/> No
50	S5.C.6.	Inspected all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. (S5.C.6.c.v) <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable
51	S5.C.6.	Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects prior to final approval and occupancy being granted. (S5.C.6.c.v) <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable
52	S5.C.6.	Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects). (S5.C.6.c.ii-iv)(S5.C.7.c.viii) 2 <input type="checkbox"/> Not Applicable
53	S5.C.6.	Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi) <input checked="" type="radio"/> Yes <input type="radio"/> No
54	S5.C.6.	Made Ecology's Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity available to representatives of proposed new development and redevelopment? (S5.C.6.d) <input checked="" type="radio"/> Yes <input type="radio"/> No
55	S5.C.6.	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? (S5.C.6.e) <input checked="" type="radio"/> Yes <input type="radio"/> No









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Annual Report

Category Name: O & M

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Number	Permit Section	Question
56 	S5.C.7.	Implemented 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 per S5.C.7.a.? <input checked="" type="radio"/> Yes <input type="radio"/> No
57 	S5.C.7.	Updated maintenance standards specified in Stormwater Management Manual for Western Washington per S5.C.7.a? (Required no later than June 30, 2022) <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable
58 	S5.C.7.	Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? If so, note in the Comments field what kinds of facilities are covered by this alternative standard. (S5.C.7.a) <input type="radio"/> Yes <input checked="" type="radio"/> No
59 	S5.C.7.	Verified that maintenance was performed per the schedule in S5.C.7.a.ii when an inspection identified an exceedance of the maintenance standard. <input checked="" type="radio"/> Yes <input type="radio"/> No
59a 	S5.C.7.	Attach documentation of maintenance time frame exceedances that were beyond the Permittee's control. <input type="button" value="Choose File"/> No file chosen <input checked="" type="checkbox"/> Not Applicable
60 	S5.C.7.	Implemented an ordinance or other enforceable mechanisms to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee per (S5.C.7.b.i (a))? <input checked="" type="radio"/> Yes <input type="radio"/> No
61 	S5.C.7.	Annually inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.7.b.i(b) <input checked="" type="radio"/> Yes <input type="radio"/> No
61a 	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.b.i (b) <input type="button" value="Choose File"/> No file chosen <input checked="" type="checkbox"/> Not Applicable

Number	Permit Section	Question
62	S5.C.7.	Achieved at least 80% of scheduled inspections to verify adequate long-term O&M. (S5.C.7.b.ii) <input checked="" type="radio"/> Yes <input type="radio"/> No
63	S5.C.7.	Annually inspected all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i) <input checked="" type="radio"/> Yes <input type="radio"/> No
63a	S5.C.7.	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i) 108
63b	S5.C.7.	Number of facilities inspected during the reporting period. 108
63c	S5.C.7.	Number of facilities for which maintenance was performed during the reporting period. 2 <input type="checkbox"/> Not Applicable
64	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.c.i. <input type="button" value="Choose File"/> No file chosen <input checked="" type="checkbox"/> Not Applicable
65	S5.C.7.	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii. <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable
66	S5.C.7.	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S5.C.7.c.iii) <input checked="" type="radio"/> Yes <input type="radio"/> No
66a	S5.C.7.	Number of known catch basins? 6095
66b	S5.C.7.	Number of catch basins inspected during the reporting period? 2809
66c	S5.C.7.	Number of catch basins cleaned during the reporting period? 983
67	S5.C.7.	Attach documentation of alternative catch basin cleaning approach, if used. (S5.C.7.c.iii. (a)-(c)) <input type="button" value="Choose File"/> No file chosen <input checked="" type="checkbox"/> Not Applicable

Number	Permit Section	Question
68	S5.C.7.	Implemented practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d) <input checked="" type="radio"/> Yes <input type="radio"/> No
69	S5.C.7.	Documented practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d – Required by December 31, 2022) <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable
70	S5.C.7.	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.7.e) <input checked="" type="radio"/> Yes <input type="radio"/> No
71	S5.C.7.	Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.7.f) <input checked="" type="radio"/> Yes <input type="radio"/> No
72	S5.C.7.	Updated, if needed, SWPPPs according to S5.C.7.f no later than December 31, 2022. <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable

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Annual Report

Category Name: Source Control

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Number	Permit Section	Question
73	S5.C.8	Adopted ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities per S.5.C.8.b.i. (Required by August 1, 2022) <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable
74	S5.C.8	Established an inventory per S5.C.8.b.ii. (Required by August 1, 2022.) <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable
75	S5.C.8	Implemented an inspection program S5.C.8.b.iii (Required by January 1, 2023). <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable
76	S5.C.8	Implemented a progressive enforcement policy per S5.C.8.b.iv (Required by January 1, 2023). <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable
77	S5.C.8	Attach a summary of actions taken to implement the source control program per S5.C.8.b.iii and S5.C.8.b.iv. <input type="button" value="Choose File"/> No file chosen <input checked="" type="checkbox"/> Not Applicable
78	S5.C.8	Attach a list of inspections, per S5.C.8.b.iii, organized by the business category, noting the amount of times each business was inspected, and if enforcement actions were taken. <input type="button" value="Choose File"/> No file chosen <input checked="" type="checkbox"/> Not Applicable
79	S5.C.8	Implemented an ongoing source control training program per S5.C.8.b.v? <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable

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Annual Report

Category Name: TMDL

Click the symbol next to each question number to leave an extended comment for that question. These comments do not count for answering the question.


Number	Permit Section	Question
80	S7	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A) <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable
81	S7	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A) <input type="button" value="Choose File"/> No file chosen <input checked="" type="checkbox"/> Not Applicable





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Annual Report

Category Name: Monitoring and Assessment

Click the  symbol next to each question number to leave an extended comment for that question. These comments do not count for answering the question.

Number	Permit Section	Question
82 	S8	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2019 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.) <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable
84 	S8	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2019 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)? <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable
86 	S8	If conducting stormwater discharge monitoring in accordance with S8.C.1, submitted a QAPP to Ecology no later than February 1, 2020? (S8.C.1.b and Appendix 9) <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable
87 	S8	If conducting stormwater discharge monitoring in accordance with S8.C.1, attach a data and analysis report per S8.C.1. and Appendix 9. (Due annually beginning March 31, 2021.) <input type="button" value="Choose File"/> No file chosen <input checked="" type="checkbox"/> Not Applicable

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2021

City of Tukwila Stormwater Management Program Plan (SWMP Plan)



City of Tukwila
Public Works Department
1/1/2021

Table of Contents

INTRODUCTION 1

STORMWATER MANAGEMENT PROGRAM COMPONENTS 3

 Stormwater Planning (S5.C.1) 4

 Public Education and Outreach (S5.C.2) 6

 Public Involvement and Participation (S5.C.3) 9

 MS4 Mapping and Documentation (S5.C.4) 11

 Illicit Discharge Detection and Elimination (S5.C.5) 13

 Controlling Runoff from New Development, Redevelopment, and Construction Sites
 (S5.C.6) 16

 Operations and Maintenance (S5.C.7) 19

 Source Control Program for Existing Development (S5.C.8) 22

COMPLIANCE WITH TOTAL MAXIMUM DAILY LOADS (Special Condition S7) 24

MONITORING AND ASSESSMENT (Special Condition S8) 25

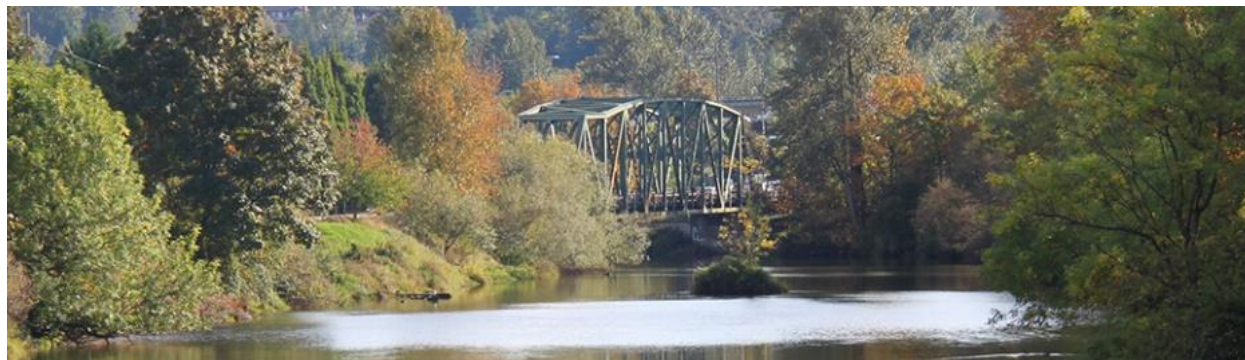
REPORTING REQUIREMENTS 26

CONCLUSION 27

Acronyms

AKART	All known, available and reasonable methods of prevention, control, and treatment
BMP	Best Management Practice
EPA	U.S. Environmental Protection Agency
KML	Keyhole Markup Language
LID	Low Impact Development
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
Phase II Permit	Western Washington Phase II Municipal Stormwater Permit
SAM	Stormwater Action Monitoring
SWMP	Stormwater Management Program
TMDL	Total Maximum Daily Load

INTRODUCTION



The National Pollutant Discharge Elimination System (NPDES) permit program is a requirement of the federal Clean Water Act, which is intended to restore and maintain the integrity of the nation's waters. The federal Environmental Protection Agency (EPA) has delegated permit authority to state environmental agencies. In Washington, the NPDES delegated permit authority is the Washington State Department of Ecology (Ecology). The first term of the modern Western Washington Phase II Municipal Stormwater Permit (Phase II Permit) began in January of 2007. The current permit term is five years, from August 1, 2019 through July 31, 2024.

The City of Tukwila prepared this document to meet the requirement for a Stormwater Management Program (SWMP) Plan as required by the NPDES Phase II Permit issued to the City of Tukwila by Ecology. The SWMP Plan was developed to reduce pollutant discharges from the City's Municipal Separate Storm Sewer System (MS4) and inform the public about the planned SWMP activities for the upcoming calendar year.

Tukwila is defined as a Phase II community and, therefore, mandated to comply with the requirements of the NPDES Phase II Permit. Phase II communities are those that:

- Are not already covered in a regional Phase I program
- Own and operate a storm drain system
- Discharge to surface waters of the state
- Are in urbanized areas (UAs)
- Have a population of more than 1,000

Approximately 100 other municipalities in Washington must now comply with the Phase II Permit, as operators of small MS4s. Ecology's Phase II Permit is available on Ecology's website at: <http://www.ecy.wa.gov/programs/wq/stormwater/municipal/phaseIIww/wwphiipermit.html>

City of Tukwila Stormwater Management Program Plan

The Permit allows discharge of stormwater runoff from municipal drainage systems into the state's water bodies (i.e., streams, rivers, lakes, wetlands, etc.) if municipalities implement programs to protect water quality by reducing the discharge of pollutants to the "maximum extent practicable" (MEP). In addition, the City must meet "all known and reasonable treatment" (AKART) through application of Permit specified "best management practices" (BMPs).

The Permit also requires by March 31 of each year the City provide an Annual Report for each previous year's activities that documents the City's compliance with the Permit. Both the Annual Report and the updated SWMP are to be posted on the City's website no later than May 31st of each year.

STORMWATER MANAGEMENT PROGRAM COMPONENTS



The BMPs specified in the Permit are collectively referred to as the SWMP Plan and grouped under the following program components:

- Stormwater Planning
- Public Education and Outreach
- Public Involvement and Participation
- MS4 Mapping and Documentation
- Illicit Discharge Detection and Elimination
- Controlling Runoff from New Development, Redevelopment, and Construction Sites
- Operations and Maintenance
- Source Control Program for Existing Development

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

- Total Maximum Daily Load Requirements
- Monitoring and Assessment
- Reporting Requirements

The following sections describe requirements of each program component and the City's planned activities to meet the requirements. In general, the City of Tukwila is currently performing all previously required Permit activities and has plans in place to address the updated and new Permit requirements.

Stormwater Planning (S5.C.1)



1.1 Permit Requirements

The Phase II Permit (Section S5.C.1) requires the City to fulfill the following minimum performance measures:

- Convene an inter-disciplinary team to inform and assist in the development, progress, and influence of the Stormwater Planning Program by August 1, 2020.
- Coordinate with long-range plan updates.
- Continue to require low impact development (LID) principles and Best Management Practices (BMPs) to make LID the preferred and commonly used approach to site development.
- Develop a Stormwater Management Action Plan (SMAP) for at least one high priority catchment area using a similar process and consider the range of issues in the Stormwater Management Action Planning Guidance (Ecology 2019; Publication 19-10-010) by March 31, 2023.

1.2 Continuing and Current Activities

Permit Section	Task Description	Compliance Timeframe
S5.C.1.c.i	Continue to require LID principles and LID BMPs when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents. Make LID the preferred and commonly used approach to site development.	Ongoing

1.3 Planned Activities - 2021

Permit Section	Task Description	Compliance Timeframe
S5.C.1.a	Continue with the inter-disciplinary standing committee from Public Works and Community Development to inform and assist in the development, progress, and influence of the Stormwater Planning Program.	Ongoing
S5.C.1.b	Begin coordination with long-range plan updates: describe (via responses to annual reporting questions) how stormwater management need and protection/ improvement of receiving water health were (or are not) addressed during the planning update process and influencing policy and strategies (e.g., updates to Comprehensive Plan or other long-range land use plans used to accommodate growth or transportation).	Deadline: March 31, 2021
S5.C.1.c	Use the new inter-disciplinary stormwater planning standing committee to assess and consider any newly identified barriers to implementing LID.	Ongoing
S5.C.4	Continue MS4 Mapping and Documentation	August 1, 2023

Public Education and Outreach (S5.C.2)

2.1 Permit Requirements

The Phase II Permit (Section S5.C.2) requires the City to fulfill the following minimum performance measures:

- Annually, at minimum, target and implement an educational and outreach program that will build general awareness to the general public (including overburdened communities, or school age children); businesses (including home-based and mobile businesses); engineers, contractors, developers, or land use planners to address a specific action that can be followed to reduce impacts to stormwater runoff.
- Affect behavior change for the public, including residents, landscapers, property managers/owners, developers, school age children, or businesses (including home-based or mobile). Encourage this behavior change by either evaluating an ongoing behavior change campaign, using resulting recommendations to develop and implement an improvement strategy or develop a new behavior change campaign with a strategy and schedule for implementation. The behavior change campaign will focus on at least one of the Best Management Practices listed in S5.C.2.a.ii(a) of the Permit.
- Create stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities such as stream teams, storm drain marking, volunteer monitoring, riparian plantings, and education activities.
- Track and maintain records of public education and outreach activities and summarize these activities in the Annual Report.



2.2 Continuing and Current Activities

Permit Section	Task Description	Compliance Timeframe
S5.C.2.a.i	<p>Continue to refine and implement general awareness activities and programs. Identify/interact with target audiences with different subject areas using existing resources:</p> <ul style="list-style-type: none"> • City’s NPDES website • Brochures, videos, and public notices • K-12 education program • Hazelnut newsletter • Suds Free Car Wash Kit • Tukwila’s government Channel 21 • Notice boards • Support Puget Sound Starts Here resources 	Ongoing
S5.C.2.a.iii	<p>Continue stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities. Current activities:</p> <ul style="list-style-type: none"> • Storm system marker program for public and private properties. • Continue partnership with Environmental Coalition of South Seattle (ECOSS) and provide a spill kit, spill plan and training to diverse businesses. • Partner with Forterra, EarthCorps, Boeing Employee Credit Union, Student Conservation Association, Dirt Corps, EarthCorps, King Conservation District, Duwamish Alive Coalition, King County Parks, Partner in Employment, resident-based community groups, and volunteers to provide stewardship and restoration activities in Tukwila’s parks and shoreline areas. • Partner with Waste Management to conduct 2021 Residential Recycling Collection Event and Rain Barrel Sale. TBD • Green Tukwila 20-year Stewardship Plan to provide a strategy for active restoration and management of public land. 	Ongoing

2.3 Planned Activities - 2021

Permit Section	Task Description	Compliance Timeframe
S5.C.2.a.ii	Conduct an evaluation of the effectiveness of the voluntary ECOSS spill kit incentive program by surveying Tukwila businesses that participated in 2020. The target audience is business owners, and the BMP is prevention of illicit discharges.	Ongoing
S.5.c.2.a.ii	Based on evaluation results, begin developing a strategy and schedule to use community-based social marketing to either improve, expand, or replace the behavior change program.	Ongoing

Public Involvement and Participation (S5.C.3)



3.1 Permit Requirements

The Phase II Permit (Section S5.C.3) requires the City to fulfill the following minimum performance measures:

- Provide ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, participating in developing rate-structures, SWMP Plan development and implementation or other similar activities.
- Make available and post the current SWMP Plan and Annual Report for the previous years on the City’s website no later than May 31st of each year. Make available to the public all other documents to be submitted to Ecology as required by the Permit.

3.2 Continuing and Current Activities

Permit Section	Task Description	Compliance Timeframe
S5.C.3.a	The public is invited to all City Council, Committee of the Whole, and Transportation and Infrastructure Committee meetings including City workshops where input on NPDES Phase II Permit related topics are accepted. <i>Currently, meetings are conducted virtually with access given to the general public.</i>	Ongoing
S5.C.3.a	Provide notices of upcoming workshops to solicit public input, on the City’s NPDES website, and City calendar. In addition, <i>when appropriate</i> notices will be posted at strategic locations such as City Hall, Public Works, Community Development and at the Tukwila Community Center.	Ongoing
S5.C.3.b	The City maintains the most current SWMP Plan and Annual Report on its NPDES website. All other submittals are available to the public upon request.	Ongoing

3.3 Planned Activities - 2021

Permit Section	Task Description	Compliance Timeframe
S5.C.3.b	Upload the 2021 SWMP Plan and 2020 Annual Report on its NPDES website.	Deadline May 31, 2021

MS4 Mapping and Documentation (S5.C.4)



4.1 Permit Requirements

The Phase II Permit (Section S5.C.4) requires the City to fulfill the following minimum performance measures:

- Ongoing mapping of known MS4 outfalls and discharge points, receiving waters, stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee, geographic areas served by the MS4 that don't discharge to surface waters, tributary conveyances to outfalls that are 24 inches in diameter or larger, connections between MS4s, and connections to the MS4 authorized or allowed by the Permittee after February 16, 2007.
- No later than January 1, 2020 begin collecting size and material for all known MS4 outfalls, and update records.
- Complete mapping of all known connections from the MS4 to privately owned stormwater systems before August 1, 2023.
- Utilize electronic mapping format with fully described mapping standards by August 1, 2021.
- Make maps available to Ecology, federally recognized Indian Tribes, municipalities, and other Permittees upon request.

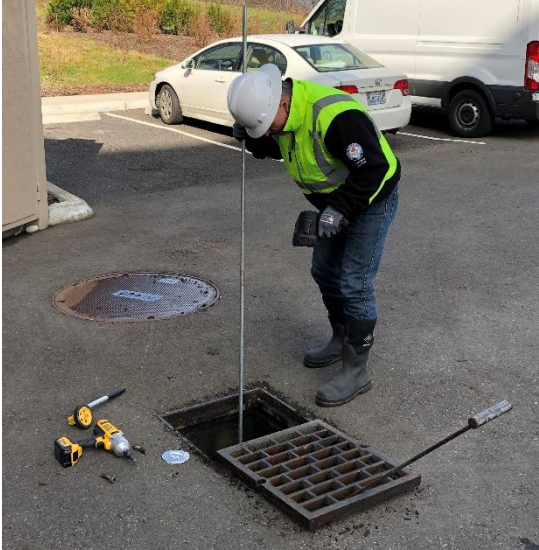
4.2 Continuing & Current Activities

Permit Section	Task Description	Compliance Timeframe
S5.C.4.a	Continue ongoing mapping of the MS4, including new connections and correcting inconsistencies as they are discovered.	Ongoing
S5.C.4.b.i	Continue collecting outfall size and material during illicit discharge inspections and updating map data, as necessary.	Ongoing
S5.C.4.d & e	Continue to make MS4 maps available to Ecology, Indian Tribes, other jurisdictions, and the public as requested.	Ongoing

4.3 Planned Activities - 2021

Permit Section	Task Description	Compliance Timeframe
S5.C.4.b.ii	Continue mapping all known connections from the MS4 to a privately-owned stormwater system.	Begin in 2020; Deadline August 1, 2023
S5.C.4.c	Continue work to consolidate mapped/tracked MS4 features into the GIS from other data repositories such as Lucity and Google Maps (KML).	Begin in 2020; Deadline August 1, 2021

Illicit Discharge Detection and Elimination (S5.C.5)



5.1 Permit Requirements

The Phase II Permit (Section S5.C.5) requires the City to fulfill the following minimum performance measures:

- Implement an ongoing Illicit Discharge Detection and Elimination (IDDE) program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4.
- Publicly list and publicize a hotline or other local telephone number for public reporting of spills and other illicit discharges.
- Inform employees and the public of hazards associated with illicit discharges.
- Implement an ordinance to effectively prohibit non-stormwater, illicit discharges and dumping into the City’s MS4.
- Implement a field screening methodology that includes an average of 12% of the MS4 each year.
- Implement a program to address illicit discharges into the MS4.
- Provide training to appropriate City employees on proper IDDE response SOPs and train municipal field staff to recognize and report illicit discharges.
- Track and maintain records of actions taken.

5.2 Continuing and Current Activities

Permit Section	Task Description	Compliance Timeframe
S5.C.5.a	Generally continue the IDDE program.	Ongoing

Permit Section	Task Description	Compliance Timeframe
S5.C.5.b	Provide and make electronically available various brochures and outreach videos to help increase public awareness of the hazards associated with illicit discharges and improper disposal of waste.	Ongoing
S5.C.5.c	The City has an ordinance and program in place that prohibits non-stormwater illicit discharges and dumping into the City’s MS4, including locating priority areas likely to have illicit discharges. The ordinance includes escalating enforcement procedures and actions.	Implemented
S5.C.5.d	<p>The City has an ongoing program designed to detect and identify non-stormwater discharges. The program includes:</p> <ul style="list-style-type: none"> • Residential, commercial, and industrial storm drainage inspections of permit issued projects. • Business inspection program that targets businesses with potential pollution generating activities. • Field screening of all accessible stormwater outfalls. • Maintenance Department provides video inspections of drainage systems, as necessary. • Private and public stormwater facilities using methods indicated in the <i>Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual</i> (Herrera Environmental Consultants, Inc.; May 2013). • GIS mapping program of the stormwater drainage system used to conduct IDDE investigations. 	Ongoing
S5.C.5.d.i	Perform IDDE field screening of at least 12% of the MS4 annually.	Ongoing
S5.C.5.d.ii	The City has an advertised reporting hotline (206) 433-1860, where hazardous waste spill, illegal dumping, illicit discharges, and spills can be reported. Also, the City initiated Tukwila Works (SeeClickFix) where online reporting is available.	Ongoing
S5.C.5.e	Provide immediate response to reported spills and illicit discharges.	Ongoing
S5.C.5.f and d.iii	Appropriate training is provided to City employees, including new hires on spill prevention/response, IDDE into the City’s MS4, and construction stormwater pollution prevention for appropriate municipal staff.	Ongoing
S5.C.5.g	<p>Recordkeeping:</p> <ul style="list-style-type: none"> • Summarize any illicit discharges, spills, and illicit connection and elimination efforts in the Annual Report. • Track and report illicit discharge effort (inspections, complaints, resolutions, etc.) using WQWWebIDDE. 	Ongoing

5.3 Planned Activities - 2021

Permit Section	Task Description	Compliance Timeframe
S5.C.5.f and d.iii	Update the IDDE training program for municipal staff.	Ongoing

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



6.1 Permit Requirements

The Phase II Permit (Section S5.C.6) requires the City to fulfill the following minimum performance measures:

- Implement and enforce an ordinance that addressed runoff from new development, redevelopment, and construction site activities. Make effective an updated program no later than June 30, 2022.
- Adopt minimum stormwater design standards that are equivalent to the minimum technical requirements in Appendix 1 of the Phase II Permit.
- Implement a permitting process with site plan review, inspection, and enforcement capability, using qualified personnel, for private and public projects.
- Provide a link to the electronic “Notice of Intent (NOI) for Construction Activity” and “NOI for Industrial Activity” to representative of proposed new development and redevelopment.
- Train staff to implement the program.
- Track and maintain records of activities associated with the regulation of new development, redevelopment, and construction sites, and summarize these activities in the Annual Report.

6.2 Continuing and Current Activities

Permit Section	Task Description	Compliance Timeframe
S5.C.6.a	Implement an ordinance or other enforceable mechanism to reduce pollutants in stormwater runoff to the MS4 from new development, redevelopment, and construction sites.	Ongoing

Permit Section	Task Description	Compliance Timeframe
S5.C.6.b	<p>The City adopted the 2016 King County Surface Water Design Manual (2016 KCSWDM). These stormwater design requirements are equivalent to the minimum technical requirements provided in Appendix 1 of the previous Phase II Permit. Staff reviews all proposed construction stormwater site plans in accordance with 2016 KCSWDM.</p>	Implemented
S5.C.6.c	<p>As part of the permitting process, pre-application meetings and weekly plan review meetings are conducted to ensure applicants' project plan submittals will meet stormwater regulations and that long-term operation and maintenance of water quality and flow control will meet the 2016 KCSWDM maintenance standards.</p>	Ongoing
S5.C.6.c.ii-v	<p>All public and private development construction sites (including transportation projects) are inspected prior to start, during, and post construction.</p>	Ongoing
S5.C.6.c.ii	<p>Inspect, prior to clearing and construction, 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, or, alternatively, inspect all construction sites meeting the minimum thresholds adopted.</p>	Ongoing
S5.C.6.c.iii	<p>Inspect all permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls. Enforce as necessary based on the inspection.</p>	Ongoing
S5.C.6.c.iv	<p>Manage maintenance activities to inspect all stormwater treatment and flow control BMPs/facilities, and catch basins, in new residential development every 6 months, until 90% of the lots are constructed to identify maintenance needs and enforce compliance with maintenance standards as needed.</p>	Ongoing
S5.C.6.c.v	<p>Inspect all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. Verify that a maintenance plan is completed and responsibility for maintenance is assigned for stormwater facilities.</p>	Ongoing
S5.C.6.c.vi	<p>Document compliance with the inspection requirements in S5.C.6.b.ii. through v. Compliance shall be determined by achieving at least 80% of the required inspections.</p>	Ongoing

Permit Section	Task Description	Compliance Timeframe
S5.C.6.c.vii	Keep records of inspection and enforcement actions, including inspection reports, warning letters, notices of violation, and other enforcement records. Keep records of maintenance inspections and activities on eTRAKit.	Ongoing
S5.C.6.c.viii	Implement an enforcement strategy in cases of non-compliance.	Ongoing
S5.C.6.d	Provide electronic links to Ecology’s “NOI for Construction Activity” and “NOI for Industrial Activity” to the applicants as part of the new development and redevelopment permit process.	Ongoing
S5.C.6.e	Train all 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) to conduct these activities. Keep training records.	Ongoing

6.3 Planned Activities – 2021

Begin reviewing King County’s 2021 Surface Water Design Manual and 2021 Stormwater Pollution Prevention Manual when they become available this year in preparation for adoption by June 30, 2022.

Operations and Maintenance (S5.C.7)



7.1 Permit Requirements

The Phase II Permit (Section S5.C.7) requires the City to fulfill the following minimum performance measures:

- Implement an operations and maintenance (O&M) program with the goal of preventing or reducing pollutant runoff from the MS4 and municipal O&M activities.
- By June 30, 2022, implement maintenance standards for the MS4 that are at least as protective as those specified in the *2019 Stormwater Management Manual for Western Washington* and continue implementing standards equivalent to those in the *2014 Stormwater Management Manual for Western Washington* until then.
- Conduct annual inspections of regulated private stormwater treatment and flow control BMPs/facilities that were permitted under the 2007 – 2019 municipal stormwater permits and that discharge to the MS4. Enforce maintenance as triggered by the maintenance standards.
- Conduct annual inspections of all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities and conduct necessary maintenance actions that will meet City adopted maintenance standards.
- Conduct spot checks of City owned flow control and water quality facilities after major storm events and repair if needed or perform any necessary maintenance.
- Inspect all catch basins and inlets owned or operated by the City at least every two years. Clean catch basins if needed to comply with maintenance standards.
- 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, including but 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. By December 31, 2022, document or update these practices, policies, and procedures.
- Implement an ongoing training program for employees of the City whose primary construction, operations, or maintenance job functions may impact stormwater quality. Document and maintain records of the training provided.

- By December 31, 2022, update as necessary the Stormwater Pollution Prevention Plans (SWPPPs) for all heavy equipment maintenance or storage yards identified for year-round facilities or yards, and material storage facilities owned or operated by the City.
- Summarize annual activities for the “Pollution Prevention and Operations and Maintenance for Municipal Operations” component of the Annual Report; identify any updates to the SWMP.

7.2 Continuing and Current Activities

Permit Section	Task Description	Compliance Timeframe
S5.C.7.a	Adopted the 2016 KCSWDM to implement the O&M program with the goal of reducing and preventing pollutant runoff from municipal operations.	Implemented
S5.C.7.a	Adopted the 2016 King County Stormwater Pollution Prevention Manual (KCSPPM) used as a maintenance standard guideline for industrial, commercial, and multi-family and residential properties.	Implemented
S5.C.7.b.i	Tukwila Municipal Code: 14.30.080 is the mechanism used to clearly identify owners of private stormwater drainage systems as responsible for maintenance, inspection, and corrections of their stormwater.	Implemented
S5.C.7.b.i	Continue inspecting all private stormwater treatment and flow control BMPs/Facilities that discharge to the MS4 and were permitted after the initial Western Washington Phase II NPDES permit in 2007.	Ongoing
S5.C.7.c.i	Annually inspect all municipal stormwater treatment and flow control facilities/BMPs. Inspect all municipal stormwater catch basins and inlets within 2 years.	Ongoing
S5.C.7.c.i	The City’s Annual Small Drainage Program maintains a list of CIP projects ranging from \$25,000 to \$150,000. This list is generated from O&M staff due to their hands-on knowledge of storm drain repair work and improvements needs that are not included in their routine schedule. The annual budget for these projects is currently \$710,000 .	Ongoing
S5.C.7.c.ii	Staff maintains a list of potential problem areas that are monitored and maintained prior to, during and after major storm events. Additional inspections occur at the discretion of the surface water department.	Ongoing
S5.C.7.c.iii	Annually inspect and provide necessary maintenance of catch basins owned and operated by the City.	Ongoing
S5.C.7.d	Continue with the City’s street sweeping program helping to reduce the amount of sediment and associated waste from entering the storm drainage system.	Ongoing

Permit Section	Task Description	Compliance Timeframe
S5.C.7.d	Implement Standard Operating Procedures incorporating pollutant source control measures to reduce stormwater impacts of various municipal maintenance activities on lands owned or maintained by the City such as maintenance yards, parks, and rights-of-way.	Ongoing
S5.C.7.e	Implement an ongoing training program for employees of the City whose primary construction, operations, or maintenance job functions may impact stormwater quality.	Ongoing
S5.C.7.f	The City has developed a SWPPP for each of its maintenance and storage yards that is reviewed annually. Records of routine inspections of these facilities and their BMPs are documented in Lucity.	Ongoing
S5.C.7.g	All records of activities conducted to meet the O&M requirements (inspections, cleaning, repairs, street sweeping, etc.) are documented in Lucity (asset management software).	Ongoing

7.3 Planned Activities – 2021

There are no new planned activities in 2021

Source Control Program for Existing Development (S5.C.8)



8.1 Permit Requirements

The Phase II Permit (Section S5.C.8) requires the City to fulfill the following minimum performance measures:

- Implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4.
- By August 1, 2022, adopt an ordinance to require application of operational source control BMPs, and if necessary, structural source control BMPs or treatment BMPs/facilities, or both, to pollution generating sources associated with existing land uses and activities.
- Establish an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4 by August 1, 2022.
- Beginning January 1, 2023, inspect 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.
- Implement a progressive enforcement policy that requires sites to comply with stormwater requirements beginning January 1, 2023.
- Train staff to conduct these activities.

8.2 Ongoing Activities

The Source Control Program for Existing Development is a new permit requirement. Through its IDDE program and its O&M activities, the City conducts inspections on some existing development that could qualify as a source control inspection

8.2 Planned Activities – 2021

Permit Section	Task Description	Compliance Timeframe
S5.C.8.b.i	Begin drafting source control ordinance or other enforceable documents requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities.	Deadline August 8, 2022
S5.C.8.b.ii	Begin developing an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4.	Deadline August 1, 2022

COMPLIANCE WITH TOTAL MAXIMUM DAILY LOADS (SPECIAL CONDITION S7)

Special Condition S7 applies if a Total Maximum Daily Load (TMDL) is approved for stormwater discharges from MS4s owned or operated by the Permittee. Applicable TMDLs are TMDLs which have been approved by EPA on or before the issuance date of this Permit or prior to the date that Ecology issues coverage under this permit, whichever is later. A TMDL is a calculation of the maximum amount of a pollutant that a water body can receive and still safely meet water quality standards. Ecology determines the reduction of pollutant discharge needed to be compliant with water quality standards.

A TMDL has not been established for the City of Tukwila receiving waters at this time, consequently no action needed at this time.

MONITORING AND ASSESSMENT (SPECIAL CONDITION S8)

Special Condition S8 requires the City to either conduct Status and Trends Monitoring and Effectiveness and Source Identification Studies or participate by paying annually into a collective fund to implement monitoring under Ecology oversight through the Stormwater Action Monitoring (SAM) program.

- The City committed in 2019 to pay into the collective SAM monitoring fund.
- Annual contribution amounts for next five years:
 - S8.A – Regional Status and Trends Monitoring, the City will pay **\$3,252**.
 - S8.B – Stormwater Management Program (SWMP) Effectiveness and Source Identification Studies, the City will pay **\$5,943**.

The **total fee of \$9,195** is due each year by August 15th until the permit expiration date of July 31, 2024.

REPORTING REQUIREMENTS

The Phase II Permit (Section S9) requires the City to fulfill the following reporting requirements:

- Submit an Annual Report electronically no later than March 31st of each year using Ecology's Water Quality Permitting Portal (WQWebPortal).
- Keep all records related to the Phase II Permit and the SWMP for at least five years.
- Make all records related to the Phase II Permit including the SWMP and the most recent Annual Report available to the public at reasonable times during business hours.
- Each Annual Report shall include the following:
 - A copy of the current SWMP Plan, as required by S5.A.2.
 - Submittal of the Annual Report form as provided by Ecology, describing the status of implementation of the requirements of the Phase II Permit during the reporting period.
 - Attachments to the Annual Report form including summaries, descriptions, reports, and other information as required, or is applicable, to meet the requirements of the Phase II Permit during the reporting period, or as a required submittal.
 - If applicable, notice that the MS4 is relying on another governmental entity to satisfy any of the obligations under the Phase II Permit.
 - Certification and signature, and notification of any changes to authorization.
 - A notification of any annexations, incorporations or jurisdictional boundary changes resulting in an increase or decrease in the geographic area of permit coverage during the reporting period.

CONCLUSION

The current Western Washington Phase II Permit expires on July 31, 2024. The Permit was reissued on July 1, 2019 and become effective on August 1, 2019. This SWMP Plan has been prepared to demonstrate efforts and compliance with the requirements of this current NPDES Phase II Permit. This SWMP Plan will be a working document with updates annually until the expiration date.

Additional information on the City's NPDES program can be found online at <https://www.tukwilawa.gov/departments/public-works/npdes/>

The public is encouraged to participate in the development of the SWMP Plan. Please contact Greg Villanueva of the City of Tukwila's Public Works Department with questions, comments, or ideas at:

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Website: <https://www.tukwilawa.gov/departments/public-works/npdes/>