



2020

# City of Tukwila Stormwater Management Program Plan (SWMP Plan)



City of Tukwila  
Public Works Department  
3/24/2020

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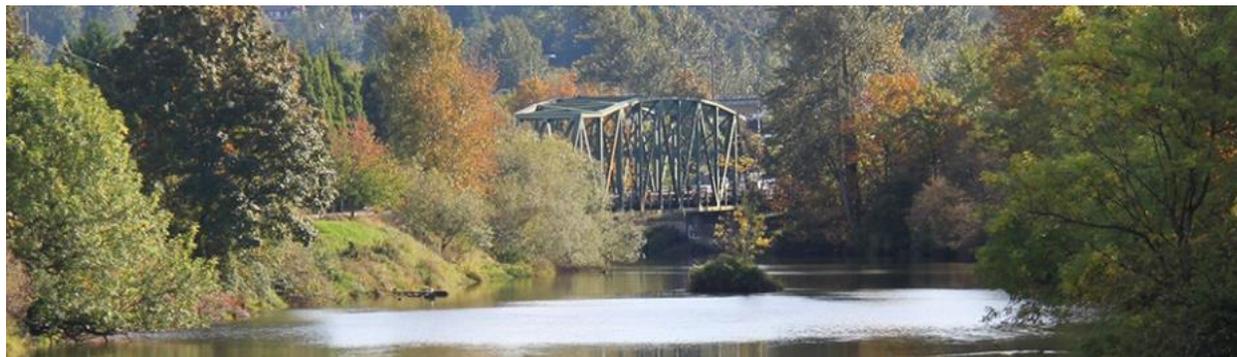
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**Acronyms**

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>

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 31<sup>st</sup> 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 - 2020**

Permit Section	Task Description	Compliance Timeframe
S5.C.1.a	Convene an inter-disciplinary standing committee from Public Works, Community Development, Economic Development and Parks and Recreation to inform and assist in the development, progress, and influence of the Stormwater Planning Program.	Deadline: August 1, 2020

Permit Section	Task Description	Compliance Timeframe
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.	Begin August 1, 2020, then ongoing

## 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"> <li>• City’s NPDES website</li> <li>• Brochures, videos, and public notices</li> <li>• K-12 education program</li> <li>• Hazelnut newsletter</li> <li>• Suds Free Car Wash Kit</li> <li>• Tukwila’s government Channel 21</li> <li>• Notice boards</li> <li>• Support Puget Sound Starts Here resources</li> <li>• Don’t Drip &amp; Drive campaign</li> <li>• Annual Touch a Truck, Backyard Wildlife Festival, and See You in the Park events</li> </ul>	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"> <li>• Storm system marker program for public and private properties.</li> <li>• Continue partnership with Environmental Coalition of South Seattle (ECOSS) and provide a spill kit, spill plan and training to diverse businesses.</li> <li>• Partner with Forterra, EarthCorps, Boeing Employee Credit Union, Student Conservation Association, and Friends of Duwamish Hill Preserve to provide stewardship training and restoration activities in City parks and shoreline areas.</li> <li>• Partner with Waste Management to conduct 2020 Residential Recycling Collection Event and Rain Barrel Sale.</li> <li>• Green Tukwila 20-year Stewardship Plan to provide a strategy for active restoration and management of public land.</li> <li>• Green Cities Partnership to care for public parks and natural open spaces.</li> </ul>	Ongoing

### 2.3 Planned Activities - 2020

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 2019. The target audience is business owners, and the BMP is prevention of illicit discharges.	Deadline July 1, 2020
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.	Strategy Deadline February 1, 2021

**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.

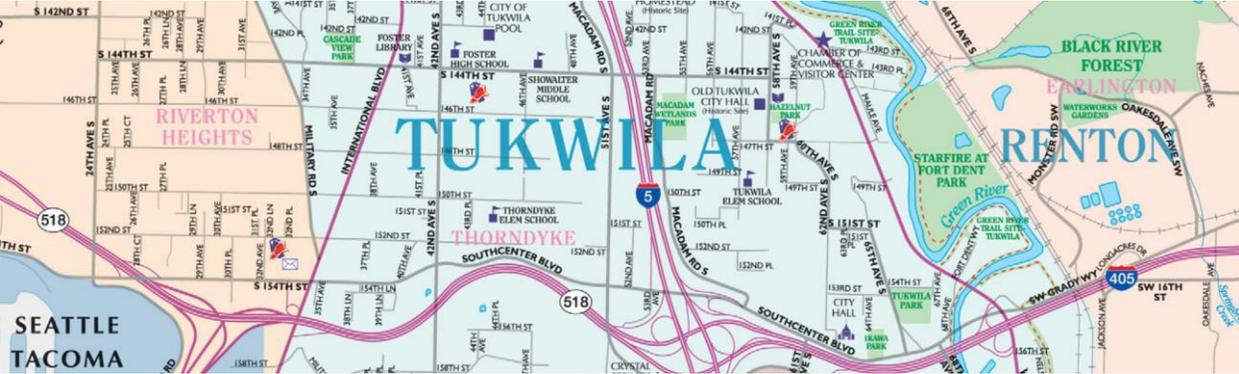
**3.2 Continuing and Current Activities**

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.	Ongoing
S5.C.3.a	Provide notices of upcoming workshops to solicit public input, in the Tukwila Reporter, City’s NPDES website, and City calendar. In addition, 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 - 2020**

Permit Section	Task Description	Compliance Timeframe
S5.C.3.b	Upload the 2020 SWMP Plan and 2019 Annual Report on its NPDES website.	Deadline March 31, 2020

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.

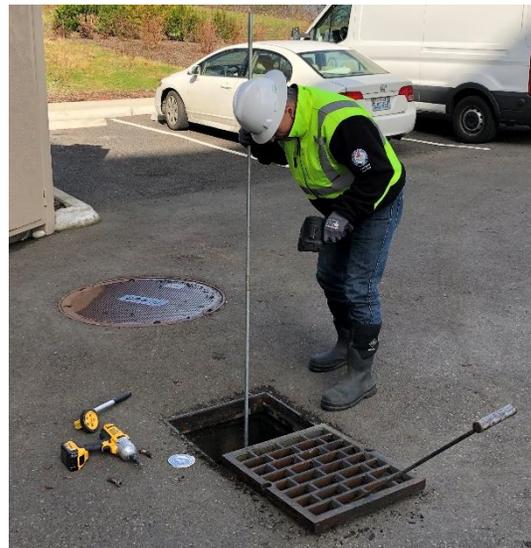
4.2 Continuing & Current Activities

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 - 2020

Permit Section	Task Description	Compliance Timeframe
S5.C.4.b.ii	Start mapping all known connections from the MS4 to a privately-owned stormwater system.	Begin in 2020; Deadline August 1, 2023
S5.C.4.c	Begin 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
S5.C.5.b	Provide and make available various brochures and outreach videos to help increase public awareness of the hazards associated with illicit discharges and improper disposal of waste.	Ongoing

Permit Section	Task Description	Compliance Timeframe
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"> <li>• Residential, commercial, and industrial storm drainage inspections of permit issued projects.</li> <li>• Business inspection program that targets businesses with potential pollution generating activities.</li> <li>• Field screening of all accessible stormwater outfalls.</li> <li>• Maintenance Department provides video inspections of drainage systems as necessary.</li> <li>• 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).</li> <li>• GIS mapping program of the stormwater drainage system used to conduct IDDE investigations.</li> </ul>	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"> <li>• Summarize any illicit discharges, spills, and illicit connection and elimination efforts in the Annual Report.</li> <li>• Track and report illicit discharge effort (inspections, complaints, resolutions, etc.) using WQWWebIDDE.</li> </ul>	Ongoing

**5.3 Planned Activities - 2020**

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 – 2020**

There are no new planned activities in 2020.

## 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 \$650,000.	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 – 2020**

There are no new planned activities in 2020.

## 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 – 2020**

Permit Section	Task Description	Compliance Timeframe
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.	Begin 2020; 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 15<sup>th</sup> 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 31<sup>st</sup> 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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Email: [greg.villanueva@tukwilawa.gov](mailto:greg.villanueva@tukwilawa.gov)

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