City of Buckley

Stormwater Management Program

2025

1.0 INTRODUCTION

This document has been prepared to satisfy the Western Washington Phase II Municipal Stormwater Permit (Permit) requirement for the continued development and updating of the Stormwater Management Program (SWMP). The purpose of the SWMP is to reduce the discharge of pollutants from the municipal stormwater system to the maximum extent practicable and to protect water quality.

The National Pollutant Discharge Elimination System (NPDES) Permit is a federal permit that regulates stormwater and wastewater discharges to waters of the State. While it is a federal permit, the regulatory authority was delegated to the Washington State Department of Ecology (Ecology). In response, Ecology developed and issued the Western Washington Phase II Municipal Stormwater Permit. The Permit was issued by Ecology in 2007, 2013, 2019 and 2024. The current permit was issued August 1, 2024, and will be in effect until July 31, 2029. It is the intent of this SWMP to recognize the current permit requirements and to plan for these requirements where appropriate.

All municipalities affected by the permit must create and implement a SWMP which addresses the following required program elements:

- Stormwater Planning
- Public Education and Outreach
- Public Involvement and Participation
- MS4 Mapping and Documentation
- Illicit Discharge Detection and Elimination (IDDE)
- Controlling Run-Off from New Development, Redevelopment and Construction Sites
- Stormwater Management for Existing Development (SMED)
- Operations and Maintenance
- Source Control Program for Existing Development
- Total Maximum Daily Loads (TMDLs), if applicable to the jurisdiction

The City of Buckley SWMP will be updated annually and submitted with the City's Annual Report to Ecology. The City of Buckley is posting this document on the City website so it can be reviewed by the public. Comments on the SWMP can be made by submitting comments in writing to the City of Buckley. Comments can be delivered or mailed to the City of Buckley, PO Box 1960, 933 Main Street, Buckley, WA 98321 ATTN: Chris Banks, Public Works Director. Emailed comments may be sent to: cbanks@cityofbuckley.com.

2.0 STORMWATER PROGRAM COORDINATION

The following section describes general requirements related to the Permit under Section S5.A of the Permit.

2.1 Permit Requirements

- Each permittee shall prepare written documentation of the Stormwater Management Program (SWMP), called the SWMP Plan. The plan shall be updated at least annually for submittal with the City's annual reports to Ecology. The SWMP Plan shall be written to inform the public of the planned SWMP activities for the upcoming calendar year.

- The SWMP shall include an ongoing program for gathering, tracking, maintaining, and using information to evaluate SWMP development, implementation, and permit compliance and to set priorities.

    - Track the cost or estimated cost of development and implementation of each component of the SWMP and track sources of funding. Submit with each annual report, no later than March 31, 2027.

    - Provide annual average costs (or estimates) to implement the SWMP and TMDL requirements.

- The SWMP shall include coordination mechanisms among departments within each jurisdiction to eliminate barriers to compliance with the Permit. A written description of internal coordination mechanisms shall be included in the Annual Report no later than March 31, 2026.

2.2 Planned Activities

Future activities planned to meet the Stormwater Program Coordination requirement of the permit are listed in Table 2-1.

Table 2-1

Planned Activities for Stormwater Program Coordination

Task ID	Task Description	Schedule
Overall Planning Related Events		
SP-C-1	Hold monthly internal status meetings on NPDES Permit compliance with Public Works Staff. Public works staff include the Stormwater Compliance personnel and the Public Works Director. The meetings will consist of assigning roles to staff/consultant for tasks to be completed over the next 3 months. These meetings will also be a check in for listing the monthly construction related inspections, plan reviews, O&M inspections, and spills. This meeting will also	Ongoing, Monthly

Task ID	Task Description	Schedule
	include discussing code barriers (i.e. LID policies, O&M related) and/or improvements that need to be made on an occasional basis. These meetings will be documented and will serve as a tracking method to ensure permit compliance. Costs associated with the program will be tracked in the City's accounting software.	
SP-C-2	Prepare SWMP Plan to discuss planned activities necessary to provide permit compliance for the upcoming year(s)	January, Annually *(due March 31st)*
SP-C-3	Prepare/Review list of internal coordination mechanisms describing how departments are inter-related in terms of meeting permit conditions (i.e. planning department reviews development plans, police departments helps observe for IDDE, etc.)	January 2026 *(Due March 31, 2026)*
SP-C-4	Staff or consultant to attend NPDES Permit Coordinators Forum Meetings and document attendance	Ongoing, Every other even month (Feb, April, etc.)
SP-C-5	Staff or consultant to attend STORM Meetings and document attendance	Ongoing, Quarterly
SP-C-6	Finance department to track costs or estimated costs for the development/implementation of each component of the SWMP and submit the annual average costs (or estimates) with the Annual Report.	Ongoing *(Submittal due in report starting March, 31, 2027)*
SP-C-7	Establish Coordination Mechanism with Other Entities (If Applicable); If another entity is used to help with the permit (i.e. consultant such as Gray & Osborne, contractor for vactoring, education expert (conservation district), etc.) is used, a letter will be signed between the City and the other party establishing rolls and the understanding that the City is the responsible party for the permit.	As needed

3.0 STORMWATER PLANNING

The following section describes the Permit requirements related to Stormwater Planning and the planned activities the City intends to conduct to meet these requirements.

3.1 Permit Requirements

The 2024 Permit (Section S5.C.1) requires the City to:

- Each Permittee shall continue to convene an inter-disciplinary team to inform and assist in the development, progress, and influence of this program.

- Coordination with long-range plan updates.

    - Each Permittee shall describe how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the long-range or comprehensive planning update processes and influencing policies and implementation strategies in their jurisdiction in the Annual Report, due March 31, 2027. The Annual Report shall describe the water quality and watershed protection policies, strategies, codes, and other measures intended to protect and improve local receiving water health through planning, considering stormwater management needs or limitations.

- Low impact development code-related requirements.

    - Permittees shall continue to require LID Principles and LID BMPs when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents, as needed.

        - Annually, each Permittee shall assess and document any newly identified administrative or regulatory barriers to implementation of LID Principles or LID BMPs since local codes were updated in accordance with the 2013 Permit, and the measures developed to address the barriers. If applicable, the report shall describe mechanisms adopted to encourage or require implementation of LID principles or LID BMPs.

    - No later than December 31, 2028, adopt and implement tree canopy goals and policies to support stormwater management. Permittees shall consider how existing or future tree canopy can support stormwater management and water quality improvements in receiving waters. Establish a long-term (e.g. 5, 10 year or longer) goal of canopy, existing or future projection, to be used for stormwater management that is appropriate to the jurisdiction. Specific considerations for canopy for stormwater management on Permittee-owned or operated lands shall include (but are not limited to):

        - Maintaining or increasing canopy in overburdened communities.

        - Maintaining existing mature canopy.

- Stormwater Management Action Planning (SMAP).

    - Permittees shall conduct a similar process and consider the range of issues outlined in the *Stormwater Management Action Planning Guidance*

(Ecology, 2024; Publication no. 24-10-027) for one new priority catchment or additional actions for an existing SMAP. A purpose of the SMAP is to support implementation in the Stormwater Management for Existing Development (SMED) Program with the identification of strategic investments through the identification of projects and actions.

- Stormwater Management Action Plan (SMAP). No later than March 31, 2027, Permittees shall complete and submit a SMAP for at least one new high priority catchment area, or additional actions for an existing SMAP, that identified all the following:

    - A description of the stormwater facility retrofits needed for the area, including the BMP types and preferred locations. Include projects that address transportation-related runoff from high traffic areas.

    - Land management/development strategies and/or actions identified for water quality management.

    - Focused, enhanced, or customized implementation of stormwater management actions related to Permit sections within S5 of the 2024 Permit, including:

        - IDDE field screening

        - Prioritization of Source Control Inspections

        - O&M inspections of enhanced maintenance; or

        - Public Education and Outreach behavior change programs

    - If applicable, identification of changes needed to local long-range plans to address SMAP priorities.

    - A proposed implementation schedule and budget sources for:

        - Short-term actions (i.e., actions to be accomplished within six years); and

        - Long-term actions (i.e., actions to be accomplished within seven to 20 years).

    - Actions in the SMAP that may benefit overburdened communities, including specifically vulnerable populations and highly impacted Communities.

- A process and schedule to provide future assessment and feedback to improve the planning process and implementation of procedures or projects.

3.2 Planned Activities

Future activities planned to meet the Stormwater Planning requirement of the permit are listed in Table 3-1.

Table 3-1

Planned Activities for Stormwater Planning

Task ID	Task Description	Schedule
Coordination with Long-Range Plan Updates		
SP-LRP-1	Form Interdisciplinary Team – the team will consist of the Stormwater Compliance personnel, Public Works Director, and Planning Director/Consultant. This group will be informed of the NPDES Permit requirements as it relates to each role within the City when necessary.	Ongoing
SP-LRP-2	Provide report regarding the review of long range plans and how they relate to stormwater. Staff will use the document review provided to Ecology in 2023 as a starting point. Topics include reviewing past plans related to growth, stormwater, watershed protection, LID (e.g. City Comp Plan, any Storm Comp. Plan, SMAP, transportation plans, Sewer/Water plans, city code, city budget)	August 2026 *(Due March 31, 2027)*
LID Code-Related Requirements		
SP-LID-1	Continue to require LID principles/BMPs when updating or developing codes or standards where appropriate (i.e. land use, stormwater management, critical areas sections, grading).	Ongoing
SP-LID-2	In a report, assess/document newly identified administrative or regulatory barriers to implementing LID (since 2013 code updates); List measures developed to address the barriers; Describe mechanisms adopted to encourage LID (if applicable).	Every January *(Due March 31st)*
SP-LID-3	Adopt and implement tree canopy goals and policies to support stormwater management and water quality improvement in receiving waters. Document considerations, reasoning, and rationale for goals/policies. Sample tree goals/policies to	By December 31, 2028

Task ID	Task Description	Schedule
	review include: https://www.redmond.gov/1256/Tree-Canopy and https://www.seattle.gov/trees/management/work-plans	
Stormwater Management Action Planning (SMAP)		
SP-SMAP-1	Complete a SMAP for at least one new high priority catchment area or additional actions for an existing SMAP. Provide 1) description of stormwater facility retrofits needed, 2) land management strategies, 3) focused stormwater management actions including IDDE field screening, prioritization of source control inspections, O&M inspections, education/outreach behavior change programs 4) If needed ID changes to long-range plans to address SMAP priorities 5) Implementation schedule (6 yrs, 20 yrs), 6) Actions that may benefit overburdened communities 7) schedule to provide future assessment	Begin April 2025, (Due March 31, 2027)

4.0 PUBLIC EDUCATION AND OUTREACH PROGRAM

The following section describes the Permit requirements related to Public Education and Outreach and the planned activities the City intends to conduct to meet these requirements.

4.1 Permit Requirements

The 2024 Permit (Section S5.C.2) requires the City to:

- Each Permittee shall implement an education and outreach program. The program design shall be based on local or regional (or a combination of both) water quality information and priority audience characteristics to identify high priority audiences, subject areas, and/or BMPs. Based on the priority audience's demographic, the Permittee shall consider delivering its selected message in language(s) other than English, as appropriate to the priority audience.

- ***General awareness***. To build general awareness, Permittees shall annually select, at a minimum, one priority audience and one subject area from what is listed below:

    - *Priority audiences:* General public (including overburdened communities, school age children, college/university, or trade students) or businesses (including home-based, or mobile businesses). Subject areas:

        - General impacts of stormwater on surface waters, including impacts from impervious surfaces.

        - Low impact development (LID) principles and LID BMPs.

    - *Priority audiences:* Engineers, contractors, developers, property owners/managers, or land use planners. Subject areas:

        - Technical standards for stormwater site and erosion control plans.

        - LID principles and LID BMPs.

        - Stormwater treatment and flow control BMPs/facilities

        - Source control BMPs for building materials to reduce pollution to stormwater, including but not limited to stormwater pollution from PCB-containing materials.

    - Permittees shall provide subject area information to the priority audience on an ongoing or strategic schedule.

- ***Behavior change***. To affect behavior change, Permittees shall select, at a minimum, one priority audience and one BMP.

    - *Priority Audiences:* Residents, landscapers, property managers/owners, developers, school age children, college/university, trade student, or businesses (including home-based or mobile businesses).

        - *BMPs:*
            - Use and storage of: pesticides, fertilizers, and/or other household chemicals.

            - Use and storage of: automotive chemicals, hazardous cleaning supplies, carwash soaps, and/or other hazardous materials.

            - Prevention of illicit discharges.

            - Yard care techniques protective of water quality.

            - Carpet cleaning.

            - Repair and maintenance BMPs for: vehicles, equipment, and/or home/buildings.

- Pet waste management and disposal.
- LID Principles and LID BMPs.
- Stormwater facility maintenance, including LID facilities.
- Dumpster and trash compactor maintenance.
- Litter and debris prevention.
- Sediment and erosion control.
- (Audience specific) Source control BMPs
- (Audience specific) Locally-important, municipal stormwater-related subject area.

- Social marketing campaign development. Based on the recommendation from 2024 evaluation and report, no later than July 1, 2025, each Permittee shall follow social marketing practices and methods and develop a campaign that is tailored to the community, including development of a program evaluation plan. Each Permittee shall:
  - Develop a strategy and schedule to implement the existing campaign more effectively; or
  - Develop a strategy and schedule to expand the existing campaign to a new priority audience or BMPs; or
  - Develop a strategy and schedule for a new priority audience and BMP behavior change campaign.
- Behavior change campaign implementation. No later than September 1, 2025, begin to implement the social marketing campaign developed above.
- Behavior change campaign evaluation. No later than March 31, 2029, evaluate and submit report on:
  - The changes in understanding and adoption of behaviors resulting from the implementation of the strategy; and
  - Any planned or recommended changes to the campaign to be more effective; describe the strategies and process to achieve the results.

- Behavior change campaign adaptive management. Permittees shall use results of the evaluation to continue to direct effective methods and implementation of the ongoing behavior change program.

- Stewardship. Each Permittee shall provide, partner with, or promote stewardship opportunities to encourage residents or businesses to participate in activities or events planned and organized within the community, such as: stream teams, storm drain marking, volunteer monitoring, riparian plantings, and watershed habitat improvement. Permittees may provide, partner with, or promote stewardship opportunities created or organized by existing organizations (including non-Permittees).

4.2 Planned Activities

Future activities planned to meet the Public Education and Outreach requirement of the permit are listed in Table 4-1.

Table 4-1

Planned Activities for Public Education and Outreach Program

Task ID	Task Description	Schedule
EDUC-1	Select one priority audience (general public/businesses or engineers/contractors/ developers) and one subject area for education: For 2025, the priority audience is the general public and the subject area will include education on general impacts of stormwater on City's website per EDUC-2 (document).	Annually, January 31st
EDUC-2	Provide general stormwater education on City's website (document) to include general stormwater management, IDDE reporting, maintenance tips, restaurant/business BMPs, and car washing. Future general topics to advertise may include pet waste management, yard care, illicit connections, spills, motor vehicle care, and household hazardous wastes.	Ongoing
EDUC-3	Promote proper pet waste management by installing/maintaining pet waste stations at city parks.	Ongoing
EDUC-4	Provide stewardship opportunities on City's website (including a link to the Pierce County Conservation District volunteer site). Future opportunities may involve working with the Conservation District or posting Puget Sound	Ongoing

Task ID	Task Description	Schedule
	Starts Here website; Document opportunities advertised.	
EDUC-5	Select one priority audience and one BMP to focus on for behavior change. Possible campaigns to consider include: Adopt a Drain, Don't wait to inflate, lawn care, dog waste, dumpster program, and don't drip and drive.	February 2025
EDUC-6	Develop new social marketing practices and methods for a new outreach program that is tailored to the community. Efforts will include conducting a survey of existing condition, research available outreach material to provide to the target audience, and determine locations/methods for distributing this information. A schedule will be developed as well.	March – May 2025 *(Due July 1, 2025)*
EDUC-7	Implement behavior change campaign.	Due September 1, 2025
EDUC-8	Report on changes in understanding/adoption of targeted behavior and recommended changes to campaign to be more effective.	Review effectiveness April 2027 & 2028; Report due March 31, 2029
EDUC-9	Stewardship: Post public opportunities to get involved on City website (i.e. links to Pierce County Conservation District); The City will review EPA's EJScreen Tool for the location of overburdened communities and will ensure to target advertising towards these communities. These opportunities will be noted within the Annual Report.	Ongoing

5.0 PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM

The following section describes the Permit requirements related to Public Involvement and Participation and the planned activities the City intends to conduct to meet these requirements.

5.1 Permit Requirements

The 2024 Permit (Section S5.C.3) requires the City to:

- Permittees shall create opportunities for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation and update of the Permittee's SMAP and SWMP.

Permittees shall document specific outreach measures for overburdened communities.

  - Annually, document specific public involvement and participation opportunities provided to overburdened communities and specifically, highly impacted communities.

  - No later than December 31, 2026, document methods used to identify overburdened communities.

- Each Permittee shall post on their website their SWMP Plan and the annual report, required under S9.A of the 2024 permit, no later than May 31st each year. All other submittals shall be available to the public upon request.

5.2 Planned Activities

Future activities planned to meet the Public Involvement and Participation requirement of the permit are listed in Table 5-1.

Table 5-1

Planned Activities for Public Involvement and Participation

Task ID	Task Description	Schedule
PI-1	Hold public meeting on the Annual SWMP via the City Council or provide on City website; Document the use of mailers and social media for advertising to the community and specifically overburdened communities to allow them to have an opportunity to participate in the decision-making processes of the SWMP.	Annually by March 31st
PI-2	Document the use of EPA's EJScreen Tool (or other data resources) for the identification of overburdened communities.	By December 31, 2026
PI-3	Hold public meeting on the new/update of the SMAP; Document the use of mailers and social media for advertising to the community and specifically overburdened communities to allow them to have an opportunity to participate in the decision-making processes of the SWMP.	By May 2026
PI-4	Post final SWMP and Annual Report to City Website and post SWMP in City Hall.	Annually April 30th *(Due by May 31st)*

6.0 MS4 MAPPING AND DOCUMENTATION

The following section describes the Permit requirements related to MS4 Mapping and Documentation and the planned activities the City intends to conduct to meet these requirements.

6.1 Permit Requirements

The 2024 Permit (Section S5.C.4) requires the City to:

- *Ongoing Mapping*: Each Permittee shall maintain mapping data for the features listed below:
    - Known MS4 outfalls and known MS4 discharge points.
        - Map outfall size and material, where known
    - Receiving waters, other than groundwater.
    - Stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee.
    - Geographic areas served by the Permittee's MS4 that do not discharge stormwater to surface waters.
    - Tributary conveyances to all known outfalls and discharge points with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems. The following features or attributes (or both) shall be mapped:
        - Tributary conveyance type, material, and size where known.
        - Associated drainage areas.
        - Land use.
    - Connections between the MS4 owned or operated by the Permittee and other municipalities or public entities.
    - All connections to the MS4 authorized or allowed by the Permittee after February 16, 2007.
    - All known connections from the MS4 to a privately owned stormwater system.
- *New Mapping*: Each Permittee shall:

- No later than March 31, 2026, submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report. Report the size and material of the outfalls, where known.

- No later than December 31, 2026, using available, existing data, map tree canopy to support stormwater management on Permittee-owned or operated properties. Permittees shall develop and follow a methodology to intentionally identify canopy for stormwater management purposes, which may be updated annually or as needed.

- No later than March 31, 2028, implement a methodology to map and assess acreage of MS4 tributary basins to outfalls with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems that have stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee. Submit with the March 31, 2028 Annual Report a map(s) (.pdf) and table (.xlsx) with a breakdown of the MS4 tributary basins quantifying estimated acres managed or unmanaged by stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee.

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

- The required format for mapping is electronic (e.g. Geographic Information System, CAD drawings, or other software that can map and store points, lines, polygons, and associated attributes), with fully described mapping standards.

- To the extent consistent with national security laws and directives, each Permittee shall make available to Ecology, upon request, available maps depicting the information required above.

- Upon request, and to the extent appropriate, Permittees shall provide mapping information to federally recognized Indian Tribes, municipalities, and other Permittees. This Permit does not preclude Permittees from recovering reasonable costs associated with fulfilling mapping information requests by federally recognized Indian Tribes, municipalities, and other Permittees.

6.2 Planned Activities

Future activities planned to meet the MS4 Mapping and Documentation requirement of the permit are listed in Table 6-1.

Table 6-1

Planned Activities for MS4 Mapping and Documentation

Task ID	Task Description	Schedule
MAP-1	Maintain existing map of: MS4 outfalls, known MS4 discharge points, receiving waters, stormwater treatment and flow control BMPs/facilities owned by the City, areas that do not discharge SW to surface waters, tributary conveyance to all knows outfalls/discharge points with a 24" nominal diameter or larger (incl. type, material, size, drainage area, and land use), connections to MS4 after Feb 16, 2007, all connections authorized to the MS4, known connections from MS4 to privately owned SW system.	Ongoing, as development occurs
MAP-2	Submit locations of all known MS4 outfalls according to the standard templates and format provided in the annual report. This will include the size and material of the outfall.	By March 31, 2026
MAP-3	Begin mapping jurisdiction-owned or operated properties with tree canopy based on available data. Develop methodology to map tree canopy for stormwater management purposes.	January 2026 *(Due by December 31, 2026)* Then annually or as needed
MAP-4	Implement methodology to map and assess acreage of MS4 tributary basins to outfalls or discharge points that have stormwater treatment and flow control BMPs/facilities owned by the City. Submit map and Excel breakdown of acres managed or unmanaged by treatment and flow control facilities owned by the City.	January 2028 *(Due by March 31, 2028)*
MAP-5	Using available existing data, map overburdened communities, that will be identified using EPA's EJScreen Tool, in relation to stormwater treatment and flow control BMPs/Facilities, outfalls, discharge points, and tree canopy on City owned or operated properties.	January 2028 *(Due by December 31, 2028)*

7.0 ILLICIT DISCHARGE DETECTION AND ELIMINATION

The following section describes the Permit requirements related to Illicit Discharge Detection and Elimination (IDDE) and the planned activities the City intends to conduct to meet these requirements.

7.1 Permit Requirements

The 2024 Permit (Section S5.C.5) requires the City to:

- The program shall include procedures for reporting and correcting or removing illicit connections, spills, and other illicit discharges when they are suspected or identified. The program shall also include procedures for addressing pollutants entering the MS4 from an interconnected, adjoining MS4.

  Illicit connections and illicit discharges must be identified through, but not limited to: field screening, inspections, complaints/reports, construction inspections, maintenance inspections, source control inspections, and/or monitoring information, as appropriate.

- Permittees shall inform public employees, businesses, and the public of hazards associated with illicit discharges and improper disposal of waste.

- Each Permittee shall implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the Permittee's MS4 to the maximum extent allowable under state and federal law. The ordinance or other regulatory mechanism in effect as of the effective date of the 2024 NPDES permit shall be revised, if necessary, to meet the requirements of this section no later than July 1, 2027.

    - Allowable Discharges: The regulatory mechanism does **not** need to prohibit the following categories of non-stormwater discharges:

        - Diverted stream flows
        - Rising groundwaters
        - Uncontaminated groundwater infiltration (as defined at 40 CFR 35.2005(b)(20)
        - Uncontaminated pumped groundwater
        - Foundation drains
        - Air conditioning condensation

- Irrigation water from agricultural sources that is commingled with urban stormwater
- Springs
- Uncontaminated water from crawl space pumps
- Footing drains
- Flows from riparian habitats and wetlands
- Non-stormwater discharges authorized by another NPDES or state waste discharge permit
- Non-stormwater discharges from emergency firefighting activities in accordance with S2 Authorized Discharges in the 2024 Permit

- Conditionally Allowable Discharges: The regulatory mechanism may allow the following categories of non-stormwater discharges only if the stated conditions are met:
    - Discharges from potable water sources, including but not limited to water line flushing, hyperchlorinated water line flushing, fire hydrant system flushing, and pipeline hydrostatic test water. Planned discharges shall be dechlorinated to a total residual chlorine concentration of 0.1 ppm or less, pH-adjusted, if necessary, and volumetrically and velocity controlled to prevent re-suspension of sediments in the MS4.
    - Discharges from lawn watering and other irrigation runoff. These discharges shall be minimized through, at a minimum, public education activities and water conservation efforts.
    - Discharges from swimming pools, spas, and hot tubs. The discharges shall be dechlorinated/debrominated to a total residual concentration of 0.1 ppm or less, free from sodium chloride, pH-adjusted, and reoxygenated if necessary, volumetrically and velocity controlled to prevent re-suspension of sediments in the MS4. Discharges shall be thermally controlled to prevent an increase in temperature of the receiving water. Swimming pool cleaning wastewater and filter backwash shall not be discharged to the MS4.
    - Street and sidewalk wash water and water used to control dust. The Permittee shall reduce these discharges through, at a minimum, public education activities and/or water conservation efforts. To avoid washing

pollutants into the MS4 Permittees shall minimize the amount of street wash and dust control water used.

- Routine external building washdown that does not use detergents for buildings built or renovated before 1950 and after 1980. These discharges shall be reduced through, at minimum, public education activities and water conservation efforts.

  Commercial, industrial, and multi-story residential structures constructed or renovated between the years 1950 and 1980 (i.e. those most likely to have PCB-containing building materials), shall be assessed for PCB-containing materials consistent with How to find and address PCBs in building materials (Ecology, 2024, Publication No. 22-04-024) prior to routine building washdown to the MS4. Structures confirmed or suspected to have PCB-containing materials shall not discharge washdown to the MS4.

  Single-family residential buildings are exempt from PCB assessment prior to building washdown, for the purposes of this section. Structures built or renovated between 1950-1980 and determined to be without PCB-containing materials may conduct routine building washdown (without detergents) as described above.

- Other non-stormwater discharges. The discharges shall be in compliance with the requirements of a pollution prevention plan reviewed by the Permittee which addresses control of such discharges.

- The Permittee shall further address any category of discharges above if the discharges are identified as significant sources of pollutants to waters of the State.

- The ordinance or other regulatory mechanism shall include escalating enforcement procedures and actions.

- Each Permittee shall implement an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the Permittee's MS4. The program shall include the following components:

  - Procedures for conducting investigations of the Permittee's MS4, including field screening and methods for identifying potential sources. These procedures may also include source control inspections.

    The Permittee shall implement a field screening methodology appropriate to the characteristics of the MS4 and water quality concerns. Screening for illicit connections may be conducted using *Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual*

(Herrera Environmental Consultants, Inc.; May 2020), or another methodology of comparable or improved effectiveness. The Permittee shall document the field screening methodology in the Annual Report.

- All Permittees shall complete field screening for an average of 12% of the MS4 each year.

- A publicly listed and publicized hotline or other telephone number for public reporting of spills and other illicit discharges.

- An ongoing training program for all municipal field staff who, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge and/or illicit connection to the MS4, on the identification of an illicit discharge and/or connection, and on the proper procedures for reporting and responding to the illicit discharge and/or connection. Follow-up training shall be provided, as needed, to address changes in procedures, techniques, requirements, or staffing. Permittees shall document and maintain records of the trainings provided and the staff trained.

- Each Permittee shall implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the Permittee's MS4. The program shall include:

  - Procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the Permittee. Procedures shall address the evaluation of whether the discharge must be immediately contained and steps to be taken for containment of the discharge.

  - Procedures for the post-emergency clean-up of firefighting activities:

    - No later than December 31, 2026, the Permittee shall coordinate with firefighting agencies/departments that serve the areas that discharge to the MS4 to be notified when PFAS-containing AFFFs are used during emergency firefighting activities.

    - No later than January 1, 2027, Permittee shall update and implement procedures to minimize discharges to the MS4 during post-emergency clean-up and disposal activities including, but not limited to, the immediate clean-up in all situations where PFAS-containing AFFFs have been used, diversions, and other measures that prevent discharges to the MS4. The Permittee is not expected to deploy control measures during an emergency.

- Procedures for tracing the source of an illicit discharge; including visual inspections, and when necessary, opening manholes, using mobile cameras, collecting and analyzing water samples, and/or other detailed inspection procedures.

- Procedures for eliminating the discharge including notification of appropriate authorities (including owners or operators of interconnected MS4s), notification of the property owner, technical assistance, follow-up inspections, and use of the compliance strategy developed, including escalating enforcement and legal actions if the discharge is not eliminated.

- Compliance with the provisions above, shall be achieved by meeting the following timelines:

    - Immediately respond to all illicit discharges, including spills, which are determined to constitute a threat to human health, welfare, or the environment, consistent with General Condition G3 of the 2024 Permit.

    - Investigate (or refer to the appropriate agency with the authority to act) within 7 days, on average, any complaints, reports, or monitoring information that indicates a potential illicit discharge.

    - Initiate an investigation within 21 days of any report or discovery of a suspected illicit connection to determine the source of the connection, the nature and volume of discharge through the connection, and the party responsible for the connection.

    - Upon confirmation of an illicit connection, use the compliance strategy in a documented effort to eliminate the illicit connection within 6 months. All known illicit connections to the MS4 shall be eliminated.

- Permittees shall train staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, including spills, and illicit connections, to conduct these activities. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements or staffing. Permittees shall document and maintain records of the training provided and the staff trained.

- Recordkeeping: Each Permittee shall track and maintain records of the activities conducted to meet the requirements of this Section. In the Annual Report, each Permittee shall submit data for the illicit discharges, spills and illicit connections including those that were found by, reported to, or investigated by the Permittee during the previous calendar year. The data shall include the information and

format specified in Appendix 13 and WQWebIDDE. Each Permittee may either use their own system or WQWebIDDE for recording this data.

7.2 Planned Activities

Future activities planned to meet the Illicit Discharge and Detection and Elimination requirement of the permit are listed in Table 7-1.

Table 7-1
Planned Activities for Illicit Discharge Detection and Elimination

Task ID	Task Description	Schedule
IDDE-1	Maintain IDDE program (see IDDE-2 through IDDE-11) for reporting, correcting and/or removing illicit connections, spills, and other illicit discharges when they are suspected or identified. In the City's asset management program, document issues identified through field screening, inspections, complaints/reports, construction inspections, maintenance inspections, source control inspections and/or monitoring. Maintain documented procedures for addressing illicit discharges/connections (see IDDE-5).	Ongoing
IDDE–2	Provide public employees, businesses, and the general public with information related to IDDE including hotline phone number (253-261-9827) on City website (https://www.cityofbuckley.com/stormwater). List actions in Annual Report.	Ongoing
IDDE-3	Implement/Review ordinance to prohibit illicit discharges including escalating enforcement actions (BMC 14.30.063).	September 2026 *(Due July 1, 2027)*
IDDE-4	Continue to use the *Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual (2020)* for field screening. Cite this source in Annual Report.	Ongoing
IDDE-5	Field Screen average of 12% of system for IDDE each year (Maintain records of which areas have been field screened and date inspected in City's asset management software). This is typically done through cb inspections.	12% of total system annually
IDDE-6	Maintain hotline (253-261-9827) for reporting spills/illicit discharges and City's SeeClickFix app; Document all calls/reports via Excel or the City's asset management software. In annual report, list that the hotline was advertised on City website.	Ongoing
IDDE-7	• Renew IDDE training for field staff and public employees; IDDE training may be done by an outside class, educational videos, or by qualified City personnel. Potential training material is located at: https://youtu.be/okYusKFmjeA?si=OOBWO62hYUHojwnM	By November (2025 and 2027), and as needed w/ new hires

Task ID	Task Description	Schedule
	• The IDDE training shall include a summary of the City's IDDE reference manual (latest *IC-ID Field Screening and Source Tracing Guidance Manual*) including discussions on field screening techniques, indicators, source tracing methodologies and appropriate contact personnel. • Track each training session with names of employees, their positions, and date.	
IDDE-8	Coordinate with City of Buckley Fire Dept. which serves the areas that discharges to the MS4, to notify the City when PFAS-containing AFFFs are used during emergency firefighting activities.	By December 31, 2026
IDDE-9	Update and implement procedures to minimize discharges to the MS4 during post emergency clean up and disposal activities including, but not limited to, the immediate clean up in all situations where PFAS-containing AFFs have been used, diversions, and other measures that prevent discharges to the MS4. (Not expected to deploy control measures during an emergency.)	By January 1, 2027
IDDE-10	**For spills:** • Immediately respond to all illicit discharges which are determined to constitute a threat to human health, welfare or the environment (see General Condition G3). • Investigate (or refer to appropriate agency) within 7 days, on avg., any complaints/reports/monitoring that indicate a potential illicit discharge. • Investigate within 21 days of any report/discovery of a suspected illicit connection to determine the source, nature and volume of discharge through the connection and party responsible. • Upon confirmation of an illicit connection, use compliance strategy in a documented effort to eliminate illicit connection within 6 months. All known illicit connections to the MS4 shall be eliminated. • Per Section G3, provide notice to Ecology and other spill response authorities within 24 hours of knowledge of a discharge/spill that is a threat to human health, welfare or the environment. • Document any spill/discharge or illicit connection to Ecology's online WQWebIDDE.	As needed
IDDE-11	Include WQWebIDDE report with Annual Report	March 31st, annually

8.0 CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT, AND CONSTRUCTION SITES

The following section describes the Permit requirements related to controlling runoff from new development, redevelopment and construction sites. It also describes the planned activities the City intends to conduct to meet these requirements.

8.1 Permit Requirements

The 2024 Permit (Section S5.C.6) requires the City to:

- Implement an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects.

- No later than June 30, 2027, each Permittee shall adopt and make effective a local program, that meets the requirements of the local requirements section below, and shall apply to all applications submitted:

    - On or after July 1, 2027.

    - Prior to January 1, 2017, that have not started construction by January 1, 2022.

    - Prior to July 1, 2022, that have not started construction by July 1, 2027.

    - Prior to July 1, 2027, that have not started construction by July 1, 2032.

- The ordinance or other enforceable mechanism shall include, at a minimum:

    - The Minimum Requirements, thresholds, and definitions in Appendix 1, or the 2019 Appendix 1 amended to include the changes identified in Appendix 10, or Phase I program approved by Ecology and amended to include Appendix 10, for new development, redevelopment, and construction sites. Adjustment and exceptions criteria equivalent to those in Appendix 1 shall be included. More stringent requirements maybe used, and/or certain requirements may be tailored to local circumstances through the use of Ecology-approved basin plans or other similar water quality and quantity planning efforts. Such local requirements and thresholds shall provide equal protection of receiving waters and equal levels of pollutant control to those provided in Appendix 1.

    - The local requirements shall include the following requirements, limitations, and criteria that, when used to implement the minimum requirements in Appendix 1 (or program approved by Ecology under the

2024 Phase I Permit), will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy the State requirement under Chapter 90.48 RCW to apply AKART prior to discharge:

- Site planning requirements;
- BMP selection criteria.
- BMP design criteria.
- BMP infeasibility criteria.
- LID competing needs criteria.
- BMP limitations.

Permittees shall document how the criteria and requirements will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy State AKART requirements.

Permittees who choose to use the requirements, limitations, and criteria, above, in the *Stormwater Management Manual for Western Washington*, or a Phase I program approved by Ecology, may cite this choice as their sole documentation to meet this requirement.

- The legal authority, through the approval process for new development and redevelopment, to inspect and enforce maintenance standards for private stormwater facilities approved under the provisions of this Section that discharge to the Permittee's MS4.

- The program shall include a permitting process with site plan review, inspection and enforcement capability to meet the standards listed in (i) through (iv) below, for both private and public projects, using qualified personnel (as defined in *Definitions and Acronyms*). At a minimum, this program shall be applied to all sites that meet the minimum thresholds adopted pursuant above.
    - Review of all stormwater site plans for proposed development activities.
    - Inspect, prior to clearing and construction, all permitted development sites that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 – Determining Construction Site Sediment Damage Potential. As an alternative to evaluating each site according to Appendix 7, Permittees may choose to inspect all construction sites that meet the minimum thresholds adopted pursuant above.

- 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.

- Each Permittee shall manage maintenance activities to inspect all stormwater treatment and flow control BMPs/facilities, and catch basins, in new residential developments at least twice per 12-month period with no less than 4 months between inspections, until 90% of the lots are constructed (or when construction has stopped and the site is fully stabilized), to identify maintenance needs and enforce compliance with maintenance standards as needed.

- 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 treatment and flow control BMPs/facilities. Enforce, as necessary, based on the inspection.

- Compliance with the inspection requirements above, shall be determined by the presence and records of an established inspection program designed to inspect all sites. Compliance shall be determined by achieving at least 80% of required inspections annually. The inspections may be combined with other inspections provided they are performed using qualified personnel.

- The program shall include a procedure for keeping records of inspections and enforcement actions by staff including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities shall be maintained.

- An enforcement strategy shall be implemented to respond to issues of non-compliance.

- The program shall make available to representatives of proposed new development and redevelopment, as applicable: the link to the online *Construction Stormwater General Permit* Notice of Intent (NOI) form for construction activity, a link to the online *Industrial Stormwater General Permit* NOI form for industrial activity, and a link to the online registration requirements for Underground Injection Control (UIC) wells. Permittees shall continue to enforce local ordinances controlling runoff form sites that are also covered by stormwater permits issued by Ecology.

- Each Permittee shall ensure that all staff whose primary job duties are implementing the program to Control Stormwater Runoff from New Development, Redevelopment, and Construction Sites, including permitting, plan

review, construction site inspections, and enforcement, are trained to conduct these activities. Follow-up training must be provided as needed to address changes in procedures, techniques or staffing. Permittees shall document and maintain records of the training provided and the staff trained.

8.2 Planned Activities

Future activities planned to meet the Control Runoff from New Development, Redevelopment and Construction Sites requirement of the permit are listed in Table 8-1.

Table 8-1

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

Task ID	Task Description	Schedule
CTRL-1	Update BMC 14.30.061 that addresses runoff from new development, redevelopment and construction site projects including the adoption of Appendix 1 of the Permit (which includes adoption of the 2024 Stormwater Management Manual for Western Washington) and allows to inspect/enforce maintenance standards for private stormwater facilities; Cite code reference in Annual Report.	Due June 30, 2027
CTRL-2	City's planner and engineering consultant will review site plans for compliance with City Code (Keep track of number of site plans reviewed in City's permit tracking software)	Ongoing
CTRL-3	Inspect construction sites prior to and during construction for erosion control (Maintain inspection records; see CTRL-6).	Ongoing
CTRL-4	Inspect all stormwater treatment and flow control BMPs/facilities, and catch basins, in new residential developments twice per 12-month period with no less than 4 months between inspections, until 90% of the lots are constructed	Ongoing
CTRL-5	Provide post construction inspections prior to approval for compliance with City Code and to verify a maintenance plan (drainage covenant) is in place. (Maintain inspection records; see CTRL-6).	Ongoing
CTRL-6	Maintain records of inspections with appropriate software (Include name of inspector, date, findings, warning letters, notices of violations, enforcement actions).	Ongoing *(Need to complete 80% of scheduled inspections)*
CTRL-7	Implement the City's enforcement strategy to respond to issues of non-compliance.	Ongoing

Task ID	Task Description	Schedule
CTRL-8	Make available (via website at https://www.cityofbuckley.com/stormwater) the electronic links to Ecology's Construction Stormwater General Permit Notice of Intent, the Industrial Stormwater General Permit Notice of Intent, and a link to the online registration requirements for UIC wells to developers.	Ongoing
CTRL-9	• Train staff in the site plan review process (https://www.wastormwatercenter.org/permit-assistance/municipal/washington-state-plan-review-training/), inspections, and enforcement. Training shall include specifics on how to apply the latest Department of Ecology *Stormwater Management Manual for Western Washington* as well as appropriate communication methods needed with developers. • Onsite inspections and enforcement shall be provided by qualified City personnel and/or appropriate Certified Erosion and Sediment Control Lead (CESCL) classes. Training classes available are listed here: https://ecology.wa.gov/regulations-permits/permits-certifications/certified-erosion-sediment-control • Maintain records of this training and names of staff trained.	Ongoing/New Hires

9.0 STORMWATER MANAGEMENT FOR EXISTING DEVELOPMENT

The following section describes the Permit requirements related to the Stormwater Management for Existing Development and the planned activities the City intends to conduct to meet these requirements.

9.1 Permit Requirements

The 2024 Permit (Section S5.C.7) requires the City to:

- Each Permittee shall implement a Program to control or reduce stormwater discharges to waters of the State from areas of existing development. The Program shall aim to focus on strategic stormwater investments over longer planning timeframes.

- **Minimum performance measures:**
    - Permittees shall implement stormwater facility retrofits, or tailored SWMP actions that meet the criteria described in Appendix 12, using one or a combination of the following:

        - Strategic stormwater investments identified in Stormwater Management Action Plan(s) (SMAPs, S5.C.1.d. in 2024 Permit), or similar stormwater planning process; and/or

        - Opportunistic stormwater investments identified by leveraging projects outside of SMAP areas to improve stormwater management and infrastructure.

    - With each Annual Report, each Permittee shall provide a list of planned, individual projects scheduled for funding or implementation during this Permit term for the purpose of meeting the assigned equivalent acreage in Appendix 12. This list shall include at a minimum the information and use the formatting specified in Appendix 12 (.xlsx file format).

    - No later than March 31, 2028, Permittees shall fully fund, start construction, or completely implement project(s) that meet the assigned equivalent acreage and submit documentation with the Annual Report (due on March 31, 2028) as described in Appendix 12.

        - Projects that started construction on or after January 1, 2023, may be included towards achieving the acres required.

        - Permittees may contribute to meeting an overall regional goal to satisfy this permit requirement.

        - Permittees that completely implement stormwater facility retrofit projects by the expiration date of this Permit that will exceed the area required for this Permit term may apply the excess as a credit to be used for the next Permit term (e.g. 2029-2034 Permit term), not to exceed 50% of the next Permit's requirement.

        - Permittees shall report which projects may provide Tribal benefits and benefits to overburdened communities including specifically Vulnerable Populations and Highly Impacted Communities.

    - Permittees may collaborate to meet a regional goal
        - Each Permittee is required to manage at least 0.5 equivalent acres within their own jurisdiction but may receive acreage credit for contributing to meeting an overall regional goal outside their defined MS4 Permit coverage area. For Permittees assigned 0.5 acres, participation and in-kind services to regional collaboration

projects may count as the contribution for this Permit term if there is regional agreement on the strategy.

- Permittees may contribute to a regional goal, that is the sum of Phase II partners assigned acreage from Appendix 12. Projects may be implemented outside of Permit coverage areas to meet their individual requirement as part of a regional goal where benefits to receiving waters within the Permit coverage areas are identified and anticipated.

- Permittees shall report the amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the next Permit term (e.g. 2029-2032). This report shall be submitted to Ecology no later than March 31, 2028.

9.2 Planned Activities

Future activities planned to meet the Source Control Program requirement of the permit are listed in Table 9-1.

Table 9-1

Planned Activities for Stormwater Management for Existing Development

Task ID	Task Description	Schedule
SMED-1	• Implement stormwater facility retrofit (water quality vault in Mason St. Basin) that treat a minimum of 0.9 acres or tailored SWMP actions (meeting criteria in Appx 12), using 1) stormwater investments ID'd in SMAP or similar stormwater planning process and/or 2) opportunistic stormwater investments outside of SMAP to improve stormwater management and infrastructure. • Provide list of planned projects for the permit cycle w/ each Annual Report. The list will include a water quality vault in the Mason St. Basin, planned for construction in 2026.	Retrofit Project – Summer 2026 *(Must fully fund, start construction or fully implement by Mar. 31, 2028)* List due March 31st Annually
SMED-2	Provide documentation of retrofit project and whether it benefited Tribal/Overburdened communities.	By March 31, 2028

Task ID	Task Description	Schedule
SMED-3	Using mapped facilities and corresponding tributary basins, report amount of estimated or projected equivalent acres managed by stormwater facility retrofits for the 2029-2032 permit term.	January 2028 *(Due by March 31, 2028)*

10.0 SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

The following section describes the Permit requirements related to the Source Control Program for Existing Development and the planned activities the City intends to conduct to meet these requirements.

10.1 Permit Requirements

The 2024 Permit (Section S5.C.8) requires the City to:

- The Permittee shall implement a program to prevent and reduce pollutants in runoff from areas of existing development that discharge to the MS4. The program shall include application of source control BMPs, inspections, and enforcement.

- **Minimum performance measures:**

    - Permittees shall enforce ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities (see Appendix 8 to identify pollutant generating sources)

      Permittees shall update and make effective the ordinance(s), or other enforceable documents, as necessary to meet the requirements of this Section no later than August 1, 2027.

      The requirements of this subsection are met by using the source control BMPs in the SWMMWW, or a Phase I Program approved by Ecology. In cases where the manual(s) lack guidance for a specific source of pollutants, the Permittee shall work with the owner/operator to implement or adapt BMPs based on the best professional judgement of the Permittee.

      Applicable operational source control BMPs shall be required for all pollutant generating sources. Structural source control BMPs, or treatment BMPs/facilities, or both, shall be required for pollutant generating sources if operational source control BMPs do not prevent illicit discharges or

violations of surface water, groundwater, or sediment management standards because of inadequate stormwater controls. Implementation of source control requirements may be done through education and technical assistance programs, provided that formal enforcement authority is available to the Permittee and is used as determined necessary by the Permittee, in accordance with what is noted below.

- Permittees shall implement a program to identify publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4. Permittees shall update the inventory at least once every 5 years. The inventory shall include:

    - Businesses and/or sites identified based on the presence of activities that are pollutant generating (refer to Appendix 8); and

    - Other pollutant generating sources, based on complaint response, such as: home-based businesses and multi-family sites.

- Permittees shall implement an inspection program, performed by qualified personnel, for sites identified pursuant above.

    - All identified sites with a business address shall be provided information about activities that may generate pollutants and the source control requirements applicable to those activities. This information shall be provided by mail, telephone, electronic communications, or in person. This information may be provided all at one time or spread out over the Permit term to allow for tailoring and distribution of the information during site inspections.

    - The Permittee shall annually complete the number of inspections equal to 20% of the businesses and/or sites listed in their source control inventory to assess BMP effectiveness and compliance with source control requirements. The Permittee may count follow-up compliance inspections at the same site toward the 20% inspection rate. The Permittee may select which sites to inspect each year and is not required to inspect 100% of sites over a 5-year period. Sites may be prioritized for inspection based on their land use category, potential for pollution generation, proximity to receiving waters, or to address an identified pollution problem within a specific geographic area or sub-basin.

    - Each Permittee shall inspect 100% of sites identified through credible complaints.

- Permittees may count inspections conducted based on complaints, or when the property owner denies entry, to the 20% inspection rate.

- Annual Reporting of inspections shall be organized by business type or activities with potential to generate pollutants to the MS4. Standard Industrial Code (SIC), Major Group, and NAICS numbers may be provided for reference as noted in Appendix 8.

- Permittees shall implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period as specified below.

    - If the Permittee determines, through inspections or otherwise, that a site has failed to adequately implement required BMPs, the Permittee shall take appropriate follow-up action(s), which may include phone calls, reminder letters, emails, or follow-up inspections.

    - When a Permittee determines that a site has failed to adequately implement BMPs after a follow-up inspection(s) the Permittee shall take enforcement action as established through authority in its municipal codes or ordinances, or through the judicial system.

    - Each Permittee shall maintain records, including documentation of each site visit, inspection reports, warning letters, notices of violations, and other enforcement records demonstrating an effort to bring sites into compliance. Each Permittee shall also maintain records of sites that are not inspected because the property owner denies entry.

    - A Permittee may refer non-emergency violations of local ordinances to Ecology, provided, the Permittee also makes a documented effort of progressive enforcement. At a minimum, a Permittee's enforcement effort shall include documentation of inspections and warning letters or notices of violation.

    - Application and enforcement of local ordinances at sites identified pursuant to the requirements noted above, including sites with discharges authorized by a separate NPDES permit.

- Permittees shall train staff who are responsible for implementing the source control program to conduct these activities. The ongoing training program shall cover the legal authority for source control, source control BMPs and their proper application, inspection protocols, lessons learned, typical cases, and enforcement procedures. Follow-up training shall be

provided as needed to address changes in procedures, techniques, requirements, or staff. Permittees shall document and maintain records of the training provided and the staff trained.

10.2 Planned Activities

Future activities planned to meet the Source Control Program requirement of the permit are listed in Table 10-1.

Table 10-1

Planned Activities for Business Source Control Inspection

Task ID	Task Description	Schedule
BUS-1	Enforce/Update ordinance (BMC 14.30.062) requiring source control BMPs (i.e. BMPs from the Ecology Stormwater Manual) for pollutant generating sources for existing land uses.	Ongoing *(Review due by Aug. 1, 2027)*
BUS-2	Update inventory of public/private institutional, commercial and industrial sites (see Appx 8 of Phase II Permit) that have the potential to generate pollutants and any complaint-based sources (home-based businesses, multi-family sites). Update inventory every five years.	June 2028 *(Due July 31, 2029)*
BUS-3	Implement business source control inspection program including education (via mail/phone/email/in-person) about source control BMPs. Document all inspections (including follow-ups) with business category, number of times inspected and if enforcement actions were taken in a single list. Include this list with the Annual Report organized by business type or by activities w/ potential to generate pollutants to MS4. Document records of sites where the owner denies entry in City's asset management software.	Feb – April Annually inspect 20% of inventory *(Due Dec. 31st each year; follow-up inspections, complaints and denied entries can count toward the 20%)*
BUS-4	Inspect all complaint-based businesses for pollution generating sources and installed BMPs. Document inspections.	Ongoing
BUS-5	Continue to implement progressive enforcement policy (BMC 14.30.910) requiring business sites to comply with	Ongoing

Task ID	Task Description	Schedule
	stormwater requirements within a reasonable time period.	
BUS-6	Train staff on conducting business source control inspections including legal authority for source control, source control BMPs and their proper application, inspection protocols, lessons learned, typical cases, and enforcement procedures. Document staff trained and date. Training available here: https://laurie-s-school-71dc.thinkific.com/courses/source-control-online-training	Ongoing/New Hires

11.0 OPERATIONS AND MAINTENANCE

The following section describes the Permit requirements related to the City's stormwater operation and maintenance practices. It also describes the planned activities the City intends to conduct to meet these requirements.

11.1 Permit Requirements

The 2024 Permit (Section S5.C.7) requires the City to:

- Each Permittee shall implement maintenance standards that are as protective, or more protective, of facility function than those specified in the *Stormwater Management Manual for Western Washington* or a Phase I program approved by Ecology. For facilities which do not have maintenance standards, the Permittee shall develop a maintenance standard. No later than June 30, 2027, Permittees shall update their maintenance standards as necessary to meet the requirements of this Section.

    - The purpose of the maintenance standard is to determine if maintenance is required. The maintenance standard is not a measure of the facility's required condition at all times between inspections. Exceeding the maintenance standard between inspections and/or maintenance is not a permit violation.

    - Unless there are circumstances beyond the Permittee's control, when an inspection identifies an exceedance of the maintenance standard, maintenance shall be performed:
        - Within 1 year for typical maintenance of facilities, except catch basins.
        - Within 6 months for catch basins.
        - Within 2 years for maintenance that requires capital construction of less than $25,000.

      Circumstances beyond the Permittee's control include denial or delay of access by property owners, denial or delay of necessary permit approvals, and unexpected reallocations of maintenance staff to perform emergency work. For each exceedance of the required timeframe, the Permittee shall document the circumstances and how they were beyond their control.

- Maintenance of stormwater treatment and flow control BMPs/facilities regulated by Permittee

    - The program shall include provisions to verify adequate long-term O&M of stormwater treatment and flow control BMPs/facilities that are

permitted and constructed pursuant to the requirements within Section 8.0 and 11.0 of this SWMP. The provisions shall include:

- Implementation of an ordinance or other enforceable mechanism that:
  - Clearly identifies the party responsible for maintenance in accordance with maintenance standards established above.
  - Requires inspection of facilities in accordance with the requirements in (b), below.
  - Establishes enforcement procedures.
- Annual inspections of all stormwater treatment and flow control BMPs/facilities that discharge to the MS4 and were permitted by the Permittee according to Section 8.0 of this SWMP, including those permitted in accordance with requirements adopted pursuant to the 2007-2024 Ecology municipal stormwater permits, unless there are maintenance records to justify a different frequency. Inspections shall be conducted by qualified personnel or a qualified third party.

  Permittees may reduce the inspection frequency based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records, the Permittee may substitute written statements to document a specific less frequent inspection schedule. Written statements shall be based on actual inspection and maintenance experience and shall be certified in accordance with G19 – Certification and Signature.

- Compliance with the inspection requirements in (b), above, shall be determined by the presence and records of an established inspection program designed to inspect all facilities, and achieving at least 80% of required inspections annually.
- The program shall include a procedure for keeping records of inspections and enforcement actions by staff, qualified personnel, and qualified third parties, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities shall be maintained.

- Maintenance of stormwater treatment and flow control BMPs/facilities regulated by the Permittee

- The program shall include provisions to verify adequate long-term O&M of stormwater treatment and flow control BMPs/facilities that are permitted and constructed pursuant to Section 8.0 and shall be maintained in accordance with Section 11.0 of this SWMP. The provisions shall include:

    - Implementation of an ordinance or other enforceable mechanism that:

        - Clearly identifies the party responsible for maintenance in accordance with maintenance standards established under Section 11.0 of this SWMP.

        - Requires inspection of facilities in accordance with the requirements in (b), below.

        - Establishes enforcement procedures.

    - Annual inspections of all stormwater treatment and flow control BMPs/facilities that discharge to the MS4 and were permitted by the Permittee according ection 8.0 of this SWMP, including those permitted in accordance with requirements adopted pursuant to the 2007-2024 Ecology municipal stormwater permits, unless there are maintenance records to justify a different frequency. Inspections shall be conducted by qualified personnel or a qualified third party.

      Permittees may reduce the inspection frequency based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records, the Permittee may substitute written statements to document a specific less frequent inspection schedule. Written statements shall be based on actual inspection and maintenance experience and shall be certified in accordance with G19 – Certification and Signature.

- Compliance with the inspection requirements in (b), above, shall be determined by the presence and records of an established inspection program designed to inspect all facilities, and achieving at least 80% of required inspections annually.

- The program shall include a procedure for keeping records of inspections and enforcement actions by staff, qualified personnel, and qualified third parties, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities shall be maintained.

- Maintenance of stormwater facilities owned or operated by the Permittee.

- Each Permittee shall implement a program to annually inspect all municipally owned or operated stormwater treatment and flow control BMPs/facilities. Permittees shall implement appropriate maintenance action(s) in accordance with the adopted maintenance standards. The inspection program shall be implemented by qualified personnel.

  Permittees may reduce the inspection frequency based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records, the Permittee may substitute written statements to document a specific less frequent inspection schedule. Written statements shall be based on actual inspection and maintenance experience and shall be certified in accordance with G19 – *Certification and Signature*.

- Each Permittee shall spot check potentially damaged stormwater treatment and flow control BMPs/facilities after major storm events (24-hour storm event with a 10 year or greater recurrence interval). If spot checks indicate widespread damage/maintenance needs, inspect all stormwater treatment and flow control BMPs/facilities that may be affected. Conduct repairs or take appropriate maintenance action in accordance with maintenance standards established above, based on the results of the inspections.

- Each Permittee shall continue to inspect all catch basins and inlets owned or operated by the Permittee by December 31, 2025 and every two years after. Clean catch basins if the inspection indicates cleaning is needed to comply with maintenance standards established in the *Stormwater Management Manual for Western Washington*. Decant water shall be disposed of in accordance with Appendix 6 – *Street Waste Disposal*.

  The following alternatives to the standard approach of inspecting all catch basins every two years may be applied to all or portions of the system:

  - The catch basin inspection schedule of every two years may be changed as appropriate to meet the maintenance standards based on maintenance records of double the length of time of the proposed inspection frequency. In the absence of maintenance records for catch basins, the Permittee may substitute written statements to document a specific, less frequent inspection schedule. Written statements shall be based on actual inspection and maintenance experiences and shall be certified in accordance with G19 –*Certification and Signature*.

  - Inspections every two years may be conducted on a "circuit basis" whereby 25% of catch basins and inlets within each circuit are inspected to identify maintenance needs. Include an inspection of

the catch basin immediately upstream of any MS4 outfall, discharge point, or connections to public or private storm systems, if applicable. Clean all catch basins within a given circuit for which the inspection indicates cleaning is needed to comply with maintenance standards established under Section 11.0 of this SWMP.

- The Permittee may clean all pipes, ditches, and catch basins and inlets within a circuit once during the permit term. Circuits selected for this alternative must drain to a single point.

- Compliance with the inspection requirements in noted above, shall be determined by the presence of an established inspection program achieving at least 95% of required inspections.

- Implement 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. No later than December 31, 2027, document the practices, policies, and procedures. Lands owned or maintained by the Permittee include, but are not limited to: streets, parking lots, roads, highways, buildings, parks, open space, road right-of-ways, maintenance yards, and stormwater treatment and flow control BMPs/facilities.

  The following activities shall be addressed**:**

  - Pipe cleaning
  - Cleaning of culverts that convey stormwater in ditch systems
  - Ditch maintenance
  - Street cleaning
  - Road repair and resurfacing, including pavement grinding
  - Snow and ice control
  - Utility installation
  - Pavement striping maintenance
  - Maintaining roadside areas, including vegetation management
  - Dust control

- Application of fertilizers, pesticides, and herbicides according to the instructions for their use, including reducing nutrients and pesticides using alternatives that minimize environmental impacts

- Sediment and erosion control

- Landscape maintenance and vegetation disposal

- Trash and pet waste management

- Building exterior cleaning and maintenance

    - For Permittee-owned buildings built or renovated between 1950-1980, update policies, practices, or procedures to include Source Control BMPs to minimize PCBs from entering the MS4. Permittees shall not discharge washdown water to the MS4 if the building is confirmed or suspected to have PCB-containing materials.

- Preparing Permittee-owned buildings for renovation or demolition.

    - Update policies, practices, or procedures to include Source Control BMPs for building materials to prevent PCBs from entering the MS4 in preparation for and during demolition and renovations.

- No later than July 1, 2027, develop and implement a municipal street sweeping program to focus on priority areas and times during the year that would reasonably be expected to result in the maximum water quality benefits to receiving waters. The following program elements shall be included

    - Priority areas: Apply street sweeping program to curbed municipal streets that discharge to outfalls and meet any of the following criteria:

        - High traffic streets, such as arterials or collectors.

        - Street that serve commercial or industrial land use areas.

    - Program timing: Sweep priority areas at least once between July and September each year and at least two additional times a year as determined by the Permittee to provide additional water quality benefits. For calendar year 2027, only one sweeping event is required between July and December.

        - Compliance during this Permit term shall be determined by records of a sweeping program designed to sweep all priority areas

identified and sweeping at least 90% of priority areas each sweeping event.

- Permittee may document reasoning for alternative sweeping timing and frequency based on local conditions (e.g., climate) and estimated pollutant deposition quantities. Documentation shall also be based on actual maintenance experience and be certified in accordance with G19 – *Certification and Signature*.

- Operational Procedures: Procedures to follow equipment design performance specifications to ensure that street sweeping equipment is operated at the proper design speed with appropriate verification, and that it is properly maintained.

- Street Waste Disposal: Dispose of sweeper waste material in accordance with Appendix 6 – *Street Waste Disposal*.

- Reporting: No later than March 31, 2028, submit with the Annual Report the following information about the priority areas:

  - Priority areas swept identified on a map (i.e. streets that are considered high traffic (estimated number of vehicles served/or arterials or collectors, and streets serving commercial or industrial land use).

  - Sweeping date(s).

  - Sweeping frequency.

  - Type of sweeper.

  - Total curb miles of priority areas and curb miles swept.

  - Approximation of street waste solids removed for each sweeping event (indicate unit of measurement and wet or dry weight, where available).

- Implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under the *Industrial Stormwater General Permit* or another NPDES permit that authorizes stormwater discharges associated with the activity. SWPPPs shall include the following information, at a minimum:

  - A detailed description of the operational and structural BMPs in use at the facility and a schedule for implementation of additional BMPs when

needed. BMPs selected shall be consistent with the Stormwater Management Manual for Western Washington, or a Phase I program approved by Ecology. The SWPPP shall be updated as needed to maintain relevancy with the facility.

- At minimum, annual inspections of the facility, including visual observations of discharges, to evaluate the effectiveness of the BMPs, identify maintenance needs, and determine if additional or different BMPs are needed. The results of these inspections shall be documented in an inspection report or check list.

- An inventory of the materials and equipment stored on-site, and the activities conducted at the facility which may be exposed to precipitation or runoff and could result in stormwater pollution.

- A site map showing the facility's stormwater drainage, discharge points, and areas of potential pollutant exposure.

- A plan for preventing and responding to spills at the facility which could result in an illicit discharge.

- Implement an ongoing training program for employees of the Permittee whose primary construction, operations, or maintenance job functions may impact stormwater quality. The training program shall address the importance of protecting water quality, operations and maintenance standards, inspection procedures, relevant SWPPPs, selecting appropriate BMPs, street sweeper operations, ways to perform their job activities to prevent or minimize impacts to water quality, and procedures for reporting water quality concerns. Follow-up training shall be provided as needed to address changes in procedures, techniques, requirements, or staffing. Permittees shall document and maintain records of training provided. The staff training records to be kept include dates, activities or course descriptions, and names and positions of staff in attendance.

- Maintain records of the activities conducted to meet the requirements of this Section.

11.2 Planned Activities

Future activities planned to meet the Municipal Operations and Maintenance requirement of the permit are listed in Table 11-1.

Table 11-1

Planned Activities for Municipal Operations and Maintenance

Task ID	Task Description	Schedule
O&M-1	Review/Update Maintenance standards (specified in Ecology's Stormwater Management Manual for Western Washington) by adopting 2024 Ecology Manual.	March 2027 *(Due June 30, 2027)*
O&M-2 / CTRL-2	Maintain ordinance (BMC 14.30.070) identifying responsible party for maintaining private flow control and water quality facilities and that allows inspection and enforcement of maintenance standards of these facilities	February 2025 *(Due June 30, 2027)*
O&M-3	Provide annual inspections of all **public** stormwater treatment and flow control BMPs/facilities. (80% needed) ▪ Maintain inspection records; see O&M-1. ▪ Document if a reduced inspection frequency is used. ▪ If inspection reveals that a maintenance standard is not being maintained, need to perform maintenance: o within 1 year (all facilities except public catch basins) o within 6 months (public catch basins) or o within 2 years (maintenance that requires capital construction of less than $25,000). ▪ Document when/if maintenance standard could not be met on time and attach to Annual Report.	June-August Ongoing *(Due annually Dec. 31st)*
O&M-4 / CTRL-4	Provide annual inspections of all **private** stormwater treatment and flow control BMPs/facilities (80% needed). Document results/enforcements and provide follow-up inspections as needed. Any maintenance activity shall be recorded.	June-August Ongoing *(Due annually Dec. 31st)*
O&M-5	Maintain records of inspections and maintenance activities. List number of stormwater treatment and flow control facilities that 1) are located in the City, 2) were inspected and 3) were maintained in Annual Report.	Ongoing *(# facilities due Mar. 31st)*

Task ID	Task Description	Schedule
O&M-6	Spot check treatment and flow control facilities/BMPs and repair, if necessary, after major storm events (24-hour storm event with a 10 year or greater recurrence interval)	After 24-hour/10-year storms (Ongoing)
O&M-7	Inspect catch basins and inlets ever 2 years (Min. 95%); Prioritize inspections in the basin noted within the SMAP first (Mason St. Basin). The total number of cbs, how many inspected and how many cleaned will be documented in the City's asset tracking software and noted within the Annual Report.	Typically inspect 50% annually *(Min. 95% of cbs to be inspected every 2 years; latest cycle due Dec. 31, 2025)*; Alternate if cbs inspected all in one year: For Jan – Dec, minimum 12% inspected *(unless IDDE-5 goal of 12% is achieved through outfall inspections)*
O&M-8	Continue to implement and update City's *Water Quality Best Management Practices for Operation and Maintenance of Publicly Owned Property* (procedures to reduce stormwater impact from all lands owned/maintained by the City and road maintenance activities); Add provisions for cleaning/maintaining building exteriors and preparing buildings for renovation/demolition. Cite documentation in Annual Report.	October 2027 *(Update due Dec 31, 2027)* / Ongoing
O&M-9	Implement a municipal street sweeping program for curbed streets to target high priority areas (high traffic roads, commercial/industrial areas) that discharge to outfalls. Sweep minimum once between July and Sept. and 2 other times throughout the year. The City is likely to keep its current schedule of sweeping twice per month and potentially once per week in October or November, as needed.	By July 1, 2027 / Ongoing 3/yr *(min. 90% target roads)*
O&M-10	Provide map showing priority areas swept including road type (arterials/collectors, serve commercial/industrial areas); sweeping dates, frequency, type of sweeper, curb miles swept vs total priority curb miles, and approximation of street waste removed.	November 2027 *(Due March 31, 2028)*
O&M-11	Update/Implement SWPPP for Public Works' Yard and any heavy equipment maintenance/storage	Ongoing

Task ID	Task Description	Schedule
	yards. SWPPP to include description of BMPs in use at the facility, annual inspections of facility to evaluate effectiveness of BMPs, ID maintenance needs which shall be documented in an inspection report or checklist, inventory of materials and equipment stored on site, activities conducted at the facility which could result in stormwater pollution, site map showing the facility's stormwater drainage, and a plan for preventing and responding to spills which could result in illicit discharge.	
O&M-12	Train staff in O&M operations (reference City's *Water Quality BMP Practices O&M for Publicly Owned Property*), inspection procedures, reporting water quality concerns, SWPPPs, and on efforts to reduce pollutants to runoff. Maintain records of this training, names/positions of staff trained and dates training was held. Resources for training classes may be found at: • https://www.wastormwatercenter.org/permit-assistance/municipal/municipal-events/ • https://www.wastormwatercenter.org/permit-assistance/municipal/permit-assistance-2/ic-id/ • https://ecoss.org/projects/municipal-stormwater/	Ongoing/New Hires

12.0 COMPLIANCE WITH TOTAL MAXIMUM DAILY LOAD (TMDL) REQUIREMENTS

The following section describes the Permit requirements related to the City's participation associated with the Snohomish River Tributaries' Total Maximum Daily Load (TMDL). It also describes the planned activities the City intends to conduct to meet these requirements.

12.1 Permit Requirements

The 2024 Permit (Appendix 2) requires the City to:

For the Lower White River pH TMDL:

Mapping:

- No later than March 31, 2029: Ensure all known pipe MS4 outfalls that the City owns or operates, which discharge to the Lower White River or its

primary tributaries within the TMDL implementation area, are mapped and documented.

- Map all tributary conveyances to the piped MS4 outfalls identified above if not already mapped

IDDE:

- No later than October 31, 2028, screen all known piped MS4 outfalls that the City owns or operates, which discharge to the Lower White River and its primary tributaries, within the TMDL implementation area.
    - For at least one dry season within this permit cycle, the City shall screen piped MS4 outfalls once a month, from May 1st – October 31st, for the presence of a discharge. All piped MS4 outfalls may be screened within the same year or divide into groups and screened over multiple years.
    - Document MS4 outfall screening results. If no discharge is found during outfall screening by October 31, 2028, the City may plan to reduce this screening to once in May and again once in October, or as close to these months as practicable, during low flow tier conditions (i.e. <900 cfs), for future permit cycles.
    - Actively controlled stormwater discharges (e.g., pump stations, batch treatment systems) are included in the screening program, but they have slightly different sampling requirements.
- If a discharge at the piped MS4 outfall is present and estimated to be more than 2.24 gpm, collect an end-of-pipe sample for soluble reactive phosphorus (SRP) analysis.
    - Sampling is restricted to May 1st – Oct. 31st when there is little to no rain locally (<0.2" rainfall in past 48 hours)
    - Sampling is restricted to when the daily average flow in the White River is lower than 2,000 cfs (USGS gage 12100490 at R Street near Auburn).
    - For all actively controlled City stormwater discharges (e.g. pump stations, batch treatment systems), no later than Oct. 31, 2028, monthly sample events must be scheduled for dates/times when discharge is known to occur within the May 1 – Oct. 31 period. If monthly sampling meets any of the SRP requirements in Section (2)(d)(i) through (iv) of Appendix 2 of the Phase II permit, the City may plan to reduce screening to once in May and once in October, or as close to these months as practicable, for future permit cycles.
- If any stormwater outfall samples collected during the critical period and analyzed for SRP concentrations exceed the values listed in the first two bullets below, the City shall begin source tracing for SRP sources to the MS4. Any sample exceedances of the SRP values noted in the first two bullets below are not a violation of this Permit. Analytical methods should follow approved methods as listed in the Phase II permit's Appendix 9, Stormwater Discharge Monitoring, and 40 CFR Section 136.3 for ortho-phosphate (parameter #44 in Table 1B). Standard Method

4500-P-G-2011 (for ortho-phosphate) is recommended for obtaining reporting limits needed for the first two bullets below.
    - 7.5 ug/L of SRP (when the daily average White River flow is less than 900 cfs at USGS gage 12100490) or,
    - 79 ug/L of SRP (when the daily average White River flow is between 900 cfs and 2,000 cfs at USGS gage 12100490) or,
    - The load of SRP is less than the waste load allocation assigned to the City.
- The City is meeting TMDL requirements, and no additional source tracing is required, if MS4 outfall screening and sampling results find any one of the following:
    - There is no discharge or, where it is not feasible to measure flow, there is no visible or measurable surface velocity (i.e. stagnant water).
    - The flow of any discharge is less than 0.005 cfs (2.24 gpm)
    - The flow of any discharge is less than 0.9 cfs (400 gpm) and the concentration of discharge is less than 7.5 ug/L of SRP (when the daily average White River flow is less than 900 cfs at USGS gage 12100490) or less than 79 ug/L of SRP (when the daily average White River flow is between 900 cfs and 2,000 cfs at USGS gage 12100490) during the critical period.
    - The flow of any discharge is greater than 0.9 cfs (400 gpm) and the load of SRP is less than the waste load allocation assigned to the City. The City may calculate a load only if none of the first two bullets conditions apply.
- The City may discontinue MS4 outfall screening and sampling at outfalls where the following applies:
    - The City screens all known pipe MS4 outfalls owned or operated by the City as described earlier every month within the dry season, for two consecutive years in a row, and both years show these MS4 outfalls meeting requirements noted above.

Controlling runoff from new development and redevelopment:

- No later than June 30, 2027, the City shall require Phosphorus Treatment BMPs as described in Ecology Stormwater Management Manual for Western Washington or an equivalent manual approved by Ecology for all new development and redevelopment projects within the TMDL implementation area that require Minimum Requirement #6, Runoff Treatment.

For the South Prairie Creek Water Quality Improvement Project:

- Designate areas discharging via the MS4 to Spiketon Creek as high priority areas for illicit discharge detection and elimination. No later than July 31, 2029, complete IDDE screening for bacteria sources in 100% of these sub-basins and implement the schedules and activities identified in S5.C.5 of the Western

Washington Phase II Permit, in response to any illicit discharges found. Investigation must include activities for both the dry season (May through September) and the wet season (October through April). IDDE screening for bacteria sources includes the inspection of city owned MS4 outfalls that are safely accessible or the next safely accessible upstream drainage access point that discharge to Spiketon Creek. The results of all bacterial screening conducted in these sub-basins shall be included in the annual reports submitted to Ecology. Each annual report's TMDL summary shall include, where applicable, qualitative, and quantitative information about IDDE field screening activities for bacteria sources, including source identification and elimination activities and sampling results.

12.2 Planned Activities

Future activities planned to meet the TMDL requirement of the permit are listed in Table 12-1.

Table 12-1

Planned Activities for TMDL Requirements

Task ID	Task Description	Schedule
TMDL-1 / MAP-1	Map all known MS4 outfalls and tributary conveyances discharging to the Lower White River or its tributaries within the TMDL implementation area	March 31, 2029
TMDL-2	For at least one dry season during the permit cycle, screen piped MS4 outfalls once/month (May 1 – Oct. 31) for presence of discharge. Document if there is discharge and if so, flow rate in outfall and flow rate at USGS gage 12100490. *If two dry seasons of screening show no discharge in pipe or flow is less than 2.24 gpm, and if grab sample results are less than 7.5 ug/L (flow at USGS gage <900 cfs) or 79 ug/L (flow at USGS gage between 900 cfs and 2,000 cfs), or if flow is greater than 400 gpm and the load of SRP is less then the City's waste load allocation, then screening can discontinue.*	1/month May 1 – Oct. 31 *(At least once before October 31, 2028; may elect to do for 2 dry seasons so as to possibly eliminate future screenings)*
TMDL-3	If discharge greater than 2.24 gpm present at a White River outfall during the screening in TMDL-2, collect end-of-pipe sample for SRP. Only sample when daily avg. flow in White river is < 2,000 cfs at	

Task ID	Task Description	Schedule
	USGS gage 12100490 at R St. in Auburn. If sample exceeds 7.5 ug/L when flow at USGS gage 12100490 is < 900 cfs or exceeds 79 ug/L when flow between 900 cfs and 2,000 cfs at the USGS gage, begin source tracing for SRP sources.	
TMDL-4	Require phosphorus treatment BMPs for all new and redevelopment projects needing runoff treatment. Update City code and developer standards.	By June 30, 2027
TMDL–5/ IDDE-5	Field screen for bacteria sources during IDDE screenings along Spiketon Creek (i.e. look for fungus, algae, color, rotten egg or musty smell)	Annually *(during cb inspections/IDDE screenings during both wet/dry seasons)*
TMDL-6/ REP-2	Include TMDL Summary with Annual Report (qualitative and quantitative info about IDDE screening, sampling results)	March, Annually *(Due Mar. 31st)*
TMDL–7	For grab sample data collected, submit data to EIM database	March, Annually

13.0 MONITORING

The following section describes the Permit requirements related to monitoring. It also describes the planned activities the City intends to conduct to meet these requirements.

13.1 Permit Requirements

The 2024 Permit (Section S8) requires the City to:

- Describe any monitoring related studies conducted throughout the year in the Annual Report.

- Reporting involved with the Regional Stormwater Management Program is not necessary as part of the Annual Report. The regional program includes status and trends monitoring, stormwater management program effectiveness studies, and source identification/diagnostic monitoring.

13.2 Planned Activities

Future activities planned to meet the monitoring requirement of the permit are listed in Table 12-1.

Table 13-1

Planned Activities for Monitoring Requirements

Task ID	Task Description	Schedule
MON-1	Opt into Regional Status and Trends Monitoring option for effectiveness and source identification studies performed by the SAM group; pay a one-time fee (was due Dec. 2024) and annual fee thereafter.	Annual payment due Aug. 15 *(beg. 2025)*

14.0 REPORTING REQUIREMENTS

The following section describes the Permit requirements related to reporting. It also describes the planned activities the City intends to conduct to meet these requirements.

14.1 Permit Requirements

The 2024 Permit (Section S9) requires the City to:

- Submit an Annual Report by March 31st of each year. The report will include:
    - Copy of the current SWMP
    - Annual Report Form (per Ecology)
    - Attachments (summaries, descriptions, reports, etc.)
    - Certification and signature
    - Notice if the City is relying on another entity to assist with permit requirements
    - Notification of any annexations, incorporations or jurisdictional boundary changes
- Keep all records related to the permit and the SWMP for at least five years.
- All records related to the permit shall be available to the public at reasonable times during business hours.

14.2 Planned Activities

Future activities planned to meet the monitoring requirement of the permit are listed in Table 13-1.

Table 14-1

Planned Activities for Reporting Requirements

Task ID	Task Description	Schedule
REP-1	Submit Annual Report	March 31st, each year
REP-2	Attach letters notifying Ecology of relying on another entity to satisfy one or more permit obligations.	March 31st, each year
REP-3 / TMDL-6	Include TMDL Summary with Annual Report (qualitative and quantitative info about IDDE screening, sampling results)	January *(Due March 31st, each year)*

15.0 COMPLIANCE WITH UNDERGROUND INJECTION CONTROL (UIC) WELL PROGRAM REQUIRMENTS

The UIC Program rule, chapter 173-218 WAC, is the regulatory authority for underground injection control wells in Washington. This section describes the requirements of the UIC well program.

15.1 UIC Program Requirements

To use the presumptive approach to meet UIC program rule authorization for municipal Class V UIC wells, jurisdictions have the option of applying the Stormwater Management Program (SWMP) that complies with their MS4 Permit to the areas served by their municipal UIC wells.

The requirements include:

- Register all UIC wells, existing (in use before February 3, 2006) and new, with Ecology.
- Complete well assessment for all existing wells in use prior to February 3, 2006.
- Site, design, construct, operate, and maintain new UIC wells according to the specifications throughout the 2024 *Stormwater Management Manual for Western Washington (SWMMWW)* Section I-4 Underground Injection Wells
- Fulfill source control and O&M requirements for both new and existing UIC wells by:
    - O&M according to the specifications of SWMMWW Section I-4.

- Source control activities (including targeted education and outreach) that are well-suited for land uses associated with the UIC wells and to the specifications in the SWMMWW.
- Provide illicit discharge detection and elimination (IDDE) programs in areas served by the UIC wells to prevent pet waste and control other sources of pathogens.

15.2 Current Activities

The City of Buckley currently has no known municipal Class V UIC wells. If constructed, they will meet the requirements of the UIC Program by applying the SWMP to the entire MS4, including areas served by UIC facilities.

Table 15-1

Current Activities for UIC Well Reporting Requirements

Task ID	Task Description	Schedule
UIC-1	For new UIC wells, registration forms are submitted 60 days prior to construction to allow for a full review of the application by Ecology and the City. All UIC wells will comply with the siting design, and treatment requirements through either the presumptive approach or the demonstrative approach.	Ongoing/As needed
UIC-2	The City will provide operations and maintenance of all UIC wells per the specifications in SWMMWW I-4.11	As needed
UIC-3	The City's Source Control Program will target pollution generating sources that potentially contribute storm runoff to the UIC wells. The City will inspect 100% of source control complaints utilizing BMP educational materials and illicit discharge violations as needed	Ongoing
UIC-4	The City's Municipal Code 14.30 outlines storm water management regulations and provides a mechanism to take enforcement actions for any code violations	Ongoing
UIC-5 / IDDE-1	The City implements an IDDE program to promote no other liquids other than stormwater to drain to UIC wells and to reduce potential pollutants in stormwater in general	Ongoing

UIC-6 / IDDE-2	The City's general public education program helps to identify and correct sources of stormwater pollution. Sampling results are used to identify and eliminate the sources of pollution. Staff also investigate any spill complaints and address them with best management practices as appropriate in a timely manner.	Ongoing
UIC-7 / BUS-3	Continue to implement Source Control and IDDE programs to identify and correct any potential sources of pollution.	Ongoing

15.3 Planned Activities

The City has implemented all required actions under the UIC Program regarding existing UIC wells. Future actions will consist of continuing to meet the requirements for any new UIC wells, as well as maintaining and improving the programs and adapting as necessary to meet program objectives.

The City plans to conduct the following activities this year, including areas that could be served by UIC wells:

- Submit all registration forms, for any new and existing UIC wells, 60 days prior to construction to allow for a full review of the application by Ecology. All UIC wells will comply with all siting design and treatment requirements through either the presumptive approach or the demonstrative approach.
- Continue to maintain facilities to enhance water quality and meet UIC program requirements.
- Continue to provide general stormwater education on the City's website along with providing stewardship opportunities on the City's website.
- Continue to post public opportunities to get involved in the development, implementation and update of the City's SWMP.
- Increase the effectiveness of the current storm water education programs.
- Educate the current businesses in the city on general stormwater management practices
- Establish a plan to have the businesses within the city to comply with the current stormwater requirements.
- Adopt and implement an ordinance that requires the use of source control BMPs for pollution generating sources.
- Continue to implement Source Control and IDDE programs to identify and correct any potential sources of pollution.
- Map all known connections from the MS4 to a privately owned stormwater system.