

I. Permittee Information	
<b>Permittee Name</b> Town of Steilacoom	<b>Permittee Coverage Number</b> WAR04-5018
<b>Contact Name</b> Mark Burlingame, Public Works Director	<b>Phone Number</b> (253) 581-1912
<b>Mailing Address</b> 1030 Roe St.	
<b>City</b> Steilacoom	<b>State</b> <b>Zip + 4</b> WA              98388-4010
<b>Email Address</b> mark.burlingame@ci.steilacoom.wa.us	

II. Regulated Small MS4 Location										
<b>Jurisdiction</b> Steilacoom	<table border="1"> <thead> <tr> <th colspan="3">Entity Type: Check the box that applies</th> </tr> <tr> <th>County</th> <th>City/Town</th> <th>Other</th> </tr> </thead> <tbody> <tr> <td></td> <td style="text-align: center;">X</td> <td></td> </tr> </tbody> </table>	Entity Type: Check the box that applies			County	City/Town	Other		X	
Entity Type: Check the box that applies										
County	City/Town	Other								
	X									
<b>Major Receiving Water(s)</b> Puget Sound										

III. Relying on another Governmental Entity	
<p>If you are relying on another governmental entity to satisfy one or more of the permit obligations, list the entity and briefly describe the permit obligation(s) they are implementing on your behalf below. <i>Attach a copy of your agreement with the other entity to provide additional detail.</i></p>	
<b>Name of Entity:</b>	<b>Permit Obligation(s):</b>

## IV. Certification

**All annual reports must be signed and certified by the responsible official(s) of permittee or co-permittees.** Please print and sign this page of the reporting form and mail it (with an original signature) to Ecology at the address noted below. An electronic signature will not suffice.

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

Name <u>Paul Loveless</u>	Title <u>Town Administrator</u>	Date _____
Name _____	Title _____	Date _____
Name _____	Title _____	Date _____
Name _____	Title _____	Date _____
Name _____	Title _____	Date _____

PLEASE indicate reporting year and your jurisdiction in Line 1, above.

PLEASE refer to the INSTRUCTIONS tab for assistance filling out this table.

NOTE: Items that have future compliance dates must still be answered to indicate status.

NOTE: For clarification on how to answer questions, place cursor over cells with red flags.

NOTE: Highlighted items indicate requirements that are due in 2010.

PLEASE review your work for completeness and accuracy. Save this worksheet as you go!

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
1. Attached annual written update of Permittee's Stormwater Management Program (SWMP), including applicable requirements under S5.A.2 and S9?	Y			
2. Attached a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period, and implications for the SWMP as per S9.E.3?	N/A		No annexations or boundary revisions occurred during the reporting year.	
3. Implemented an ongoing program for gathering, tracking, maintaining, and using information to evaluate SWMP development, implementation and permit compliance and to set priorities? (S5.A.3)	Y		The Town is currently under contract with Gray & Osborne Inc. to provide an update to our Stormwater Comprehensive Plan. This contract includes a review of current SWMP.	
4. Began tracking costs or estimated costs of the development and implementation of the SWMP? (Required no later than January 1, 2009, S5.A.3.a)	Y		Costs are tracked via separate utility budget for stormwater activities, including development/implementation of SWMP	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
5. SWMP includes an education program aimed at residents, businesses, industries, elected officials, policy makers, planning staff and other employees of the Permittee? ( <i>Required to begin</i> by February 15, 2009, S5.C.1)	Y		See Section 3.3 of SWMP. Activities included storm drain stenciling using local Boy Scout Troop #71 and periodic public outreach articles in the Town Newsletter, which is mailed to all Town residents.	See copies of "Around Town Newsletters" (8/10 p.4, 10/10 p.4, 11/10 p.4) enclosed.
6. Distributed appropriate information to target audiences identified in the area served by the MS4? ( <i>Required to begin</i> by February 15, 2009, S5.C.1.a)	Y		Monthly Town newsletter mailed to all residents contain periodic information on storm drainage pollution prevention, pet waste, etc.	See copies of "Around Town Newsletters" (8/10 p.4, 10/10 p.4, 11/10 p.4) enclosed.
7. Tracked the types of public education and outreach activities implemented. ( <i>Required to begin</i> by February 15, 2009, S5.C.1.c)	Y		Tracked periodic publication of materials related to S5.C.1	
7b. Number of activities implemented:		5	Includes 3 Nesitter articles and 2x storm drain stenciling. Stenciling completed in August of 2010	
8. Measured the understanding and adoption of the targeted behaviors among at least one targeted audience in at least one subject area. ( <i>Required to begin</i> by February 15, 2009, S5.C.1.b)	Y		Included educational dialogue with Boy Scouts to further their understanding of how illicit discharge of stormwater can affect water quality	
9. Provided opportunities for the public to participate in the decision making processes involving the development, implementation and updates of the Permittee's SWMP? ( <i>Required</i> by February 15, 2008, S5.C.2.a)	Y		SWMP reviewed with Council in public meetings that include citizen comment period.	
10. Developed and implemented a process for public involvement and consideration of public comments on the SWMP? ( <i>Required</i> by February 15, 2008, S5.C.2.a)	Y		SWMP reviewed with Council in public meetings that include citizen comment period.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
11. Made the most current version of the SWMP available to the public. (S5.C.2.b)	Y		Copies available at the counter of Utility Payment Center, by request or via Town Website	
12. Posted the SWMP and latest annual report on your website. (S5.C.2.b)	Y			
12b. NOTE website address in <i>Attachment</i> field:				townofstellacoom.com/townoffices/publicworks
13. Initiated or implemented an ongoing program to detect and remove illicit connections and illegal discharges into the Permittee's MS4? ( <i>Required</i> August 19, 2011, S5.C.3)	N			
14. Developed and currently maintain a map of your MS4? ( <i>Required</i> by February 16, 2011, S5.C.3.a)	Y		Current map developed using GIS and being intergrated into current draft of updated stormwater comp. plan	
14b. Initiated a program to develop and maintain a map of all connections to the MS4 authorized or allowed by the Permittee after the Permit effective date? (S5.C.3.a.ii)	Y			
15. Map shows the location of all known municipal separate storm sewer outfalls, receiving waters and structural stormwater BMPs owned, operated, or maintained by the Permittee? ( <i>Required</i> by February 16, 2011, S5.C.3.a.i)	Y			
16. Map shows all storm sewer outfalls with a 24 inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems and includes tributary conveyances, associated drainage areas and land use? ( <i>Required</i> by February 16, 2011, S5.C.3.a.i)	Y			

<b>Question</b>	<b>Y/N/ NA</b>	<b>#</b>	<b>Comments (50 word limit)</b>	<b>Name of Attachment &amp; Page #, if applicable</b>
17. Map shows geographic areas served by the Permittee's MS4 that do not discharge stormwater to surface waters? ( <i>Required</i> by February 16, 2011, S5.C.3.a.iii)	Y			
18. Map has been made available upon request? (S5.C.3.a.iv)	Y			
19. Developed and implemented regulatory actions necessary to effectively prohibit non-stormwater, illicit discharges into the Permittee's MS4? ( <i>Required</i> by August 15, 2009, S5.C.3.b)	Y		Stellacoom Municipal Code Chapter 13.51 provides for administration, management and enforcement of the provisions related to stormwater	
20. Developed and implemented an ongoing program to detect and address non-stormwater illicit discharges, including spills, and illicit connections into the Permittee's MS4? ( <i>Required</i> by August 19, 2011, S5.C.3.c)	N		Currently being drafted	
21. Developed procedures for locating priority areas likely to have illicit discharges, including at a minimum: evaluating land uses and associated business/industrial activities present; areas where complaints have been registered in the past; and areas with storage of large quantities of materials that could result in illicit discharges, including spills? ( <i>Required</i> by August 19, 2011, S5.C.3.c.i)	N		Currently being drafted as part of rewrite of Stormwater Comprehensive Plan	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
22. Implemented field assessment activities, including visual inspection of priority outfalls identified during dry weather, and for the purposes of verifying outfall locations, identified previously unknown outfalls, and detected illicit discharges? ( <i>Required</i> by August 19, 2011, S5.C.3.c.ii)	N		Currently under development as part of the update of the Town Stormwater Comprehensive Plan	
23. Prioritized receiving waters for visual inspection? ( <i>Required</i> by February 16, 2010, S5.C.3.c.ii)	Y		Receiving waters are being identified and prioritized currently in re-write of Stormwater Comp. Plan	
24. Conducted field assessments for three high priority water bodies? ( <i>Required</i> by February 16, 2011, S5.C.3.c.ii)	Y		Field assessments being conducted during re-write of Stormwater Comp. Plan currently.	
25. Conducted field assessments on at least one high priority water body? ( <i>Required</i> annually after February 16, 2011, S5.C.3.c.ii)	Y		Field assessments being conducted during re-write of Stormwater Comp. Plan currently.	
26. Developed and implemented procedures for characterizing the nature of, and potential public or environmental threat posed by, any illicit discharges found by or reported to the Permittee? ( <i>Required</i> by August 19, 2011, S5.C.3.c.iii)	N/A			
27. Developed and implemented 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? ( <i>Required</i> by August 19, 2011, S5.C.3.c.iv)				

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
28. Developed and implemented procedures for removing the source of the discharge, including notification of appropriate authorities; notification of the property owner; technical assistance for eliminating the discharge; follow-up inspections; and escalating enforcement and legal actions if the discharge is not eliminated? ( <i>Required</i> by August 19, 2011, S5.C.3.c.v.)	N/A			
29. Informed public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste? ( <i>Required</i> by August 19, 2011, S5.C.3.d)	Y		Through periodic newsletter articles (Around Town).	
30. Distributed appropriate information to target audiences identified pursuant to S5.C.1? ( <i>Required</i> by August 19, 2011, S5.C.3.d.i)				
31. Publicized a hotline or other local telephone number for public reporting of spills and other illicit discharges? ( <i>Required</i> by February 15, 2009, S5.C.3.d.ii)	Y		On TYown website	
31b. Number of hotline calls received:		0		
31c. Number of follow-up actions taken in response to calls:		0		
32. Maintained a hotline or other reporting number for public reporting of illicit discharges, including spills? ( <i>Required</i> by February 15, 2009, S5.C.3.d.ii)	Y			
32b. NOTE hotline number in <i>Comments</i> field	Y			
33. Tracked the number of illicit discharges, including spills, identified? ( <i>Required</i> by August 19, 2011, S5.C.3.e)	Y			

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
33b. Number of illicit discharges identified:		0		
34 Tracked the number of inspections made for illicit connections? ( <i>Required</i> by August 19, 2011, S5.C.3.e)	N			
34b. Number of inspections:		0		
35 Received feedback from IDDE public education efforts? ( <i>Required</i> by August 19, 2011, S5.C.3.e)	N			
36 <b>Attached</b> report on IDDE public education efforts? ( <i>Required</i> by August 19, 2011, S5.C.3.d, S5.C.3.e)	N			
37 Municipal field staff responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges, improper disposal and illicit connections are trained to conduct these activities? ( <i>Required</i> by August 15, 2009, S5.C.3.f.i)	Y			
37b. Number of trainings provided:		1		
37c. Number of staff trained:		3		
38 Provided follow-up training as needed to address changes in procedures, techniques or requirements? ( <i>Required</i> by August 15, 2009, S5.C.3.f.i)	Y			
38b. Number of trainings provided:		1		
38c. Number of staff trained:		3		

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
39 Developed and implemented an ongoing training program on the identification of an illicit discharge/connection, and on the proper procedures for reporting and responding to the illicit discharge/ connection for all municipal field staff, which, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge or illicit connection to the storm sewer system? <i>(Required by February 16, 2010, S5.C.3.f.ii.)</i>	Y			
39b. Number of trainings provided:		1		
39c. Number of staff trained:		3		
40 Developed, implemented and enforced a program to reduce pollutants in stormwater runoff to a regulated small MS4 from new development, redevelopment and construction site activities? <i>(Required by February 16, 2010, S5.C.4)</i>	Y			
41 Applied stormwater runoff program to all sites that disturb a land area 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? <i>(Required by February 16, 2010, S5.C.4)</i>	Y			
42 Applied stormwater runoff program to private and public development, including roads? <i>(Required by February 16, 2010, S5.C.4)</i>	Y			See Builder's Packet, Attached

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
43 Applied the Technical Thresholds in Appendix 1 to all sites 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? <i>(Required by February 16, 2010, S5.C.4)</i>	Y			See Builder's Packet, Attached
44 Adopted and implemented regulatory mechanism (such as an ordinance) necessary to address run-off from new development, redevelopment and construction site activities? <i>(Required by February 16, 2010, S5.C.4.a)</i>	Y		Stellacoom Municipal Code, Ch. 13.51	
45 Retained existing local requirements to apply stormwater controls at smaller sites or at lower thresholds than required pursuant to S5.C.4? <i>(S5.A.4)</i>	Y			
46 The ordinance or other enforceable mechanism includes the minimum requirements, technical thresholds, and definitions in Appendix 1 (or an equivalent approved by Ecology under the NPDES Phase I Municipal Stormwater Permit) for new development, redevelopment, and construction sites? <i>(Required by February 16, 2010, S5.C.4.a.i)</i>	Y			
47 The ordinance or other enforceable mechanism includes exceptions and variance criteria equivalent to those in Appendix 1? <i>(Required by February 16, 2010, S5.C.4.a.i., and Section 6 of Appendix 1)</i>	Y			

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>
48 Were exceptions or variances to the minimum requirements in Appendix 1 granted? <i>(Required by February 16, 2010, S5.C.4.a.i., and Section 6 of Appendix 1)</i>	N			
48b. If so, how many were granted?		0		
49 The ordinance or other enforceable mechanism includes a site planning process and BMP selection and design criteria that, when used to implement the minimum requirements in Appendix 1 (or equivalent approved by Ecology under the Phase I Permit) will protect water quality, reduce the discharge of pollutants to the maximum extent practicable and satisfy the State requirement under Chapter 90.48 RCW to apply all known, available and reasonable methods of prevention, control and treatment (AKART) prior to discharge? <i>(Required by February 16, 2010, S5.C.4.a.ii)</i>	Y			
49b. Cite documentation to meet this requirement in <i>Attachment</i> field:				Builder's Packet, attached
50 The ordinance or other enforceable mechanism provides the legal authority, through the approval process for new development, to inspect private stormwater facilities that discharge to the Permittee's MS4? <i>(Required by February 16, 2010, S5.C.4.a.iii)</i>	Y		Stellacoom Municipal Code Chapter 13.51 provides legal authority for inspection of all stormwater facilities (article 7)	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
51 The ordinance or other enforceable mechanism allows non-structural preventive actions and source reduction approaches such as Low Impact Development (LID) Techniques to minimize the creation of impervious surfaces and minimize the disturbance of native soils and vegetation? ( <i>Required</i> by February 16, 2010, S5.C.4.a.iv)	Y		Maximum Lot coverage provisions encourage the use of non-structural preventive actions and/or LID techniques	
52 If the ordinance or regulatory mechanism allows construction sites to apply the <b>Erosivity Waiver</b> in Appendix 1, Minimum Requirement #2, does it include appropriate, escalating enforcement sanctions for construction sites that provide notice to the Permittee of their intention to apply the waiver but do not meet the requirements (including timeframe restrictions, limits on activities that result in non-stormwater discharges, and implementation of appropriate BMPs to prevent violations of water quality standards) to qualify for the waiver? (If waiver is allowed, the qualification is <i>required</i> by February 16, 2010, S5.C.4.a.v)	N		Waiver is not allowed	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
53 Developed and implemented a permitting process to address runoff from new development, redevelopment and construction site activities with plan review, inspection, and enforcement capability? <i>(Required by February 16, 2010, S5.C.4.b)</i>	Y			
54 Applied permitting process to all sites that disturb a land area 1 acre or greater, including projects less than one acre that are part of a larger common plan of the development or sale? <i>(Required by February 16, 2010, S5.C.4.b)</i>	Y			
55 Reviewed <b>Stormwater Site Plans</b> for new development and redevelopment projects? <i>(Required by February 16, 2010, S5.C.4.b.i)</i>	N/A			
55b. Number of site plans reviewed during the reporting period:		0	None received in reporting period.	
56 Inspected, prior to clearing and construction, all known development sites that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 <b>Determining Construction Site Sediment Potential?</b> <i>(Required by February 16, 2010, S5.C.4.b.ii)</i>	N/A		None received in reporting period.	
56b. Number of qualifying sites inspected prior to clearing and construction during the reporting period:		0		

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
57 Inspected construction-phase stormwater controls at all known permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls? ( <i>Required</i> by February 16, 2010, S5.C.4.b.iii)	N/A		none received in reporting period.	
57b. Number of sites inspected during the construction phase for the reporting period:		0		
58 Enforced as necessary based on the inspection at new development and redevelopment projects? ( <i>Required</i> by February 16, 2010, S5.C.4.b.iii)	N/A		None received in reporting period.	
58b. Number of enforcement actions taken during the reporting period:		0		
59 Inspected qualifying permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater controls such as stormwater facilities and structural BMPs? ( <i>Required</i> by February 16, 2010, S5.C.4.b.iv and v)	N/A		None received in reporting period.	
59b. Number of qualifying sites known during the reporting period:		0		
59c. Number of qualifying sites inspected during the reporting period:		0		
60 Verified a maintenance plan is completed and responsibility for maintenance is assigned for qualifying projects? ( <i>Required</i> by February 16, 2010, S5.C.4.b.iv)	Y			

Question	Y/N/NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
61 Enforced regulations as necessary based on the inspection? ( <i>Required</i> by February 16, 2010, S5.C.4.b.iv)	Y	0		
61b. Number of enforcement actions taken during the reporting period:		0		
62 Developed and implemented an enforcement strategy to respond to issues of non-compliance with the regulations for qualifying projects? ( <i>Required</i> by February 16, 2010, S5.C.4.b.vi)	Y		Civil penalties can be assessed per SMC 13.51.280	
63 Did the Permittee choose to allow construction sites to apply the <b>Erosivity Waiver</b> in Appendix 1, Minimum Requirement #2? (S5.C.4.b.vii)	N			
63b. If yes, how many waivers were allowed ?		0		
64 Developed and implemented a long-term operation and maintenance (O&M) program for post-construction stormwater facilities and BMPs? ( <i>Required</i> by February 16, 2010, S5.C.4.c)				
65 Adopted an ordinance or other regulatory mechanism that clearly identifies the party responsible for maintenance, requires inspection of facilities and establishes enforcement procedures? ( <i>Required</i> by February 16, 2010, S5.C.4.c.i)	Y		Through final plat process, CCR's when required and enforcement procedures per Article 8, Chapter 13.51, Steilacoom Municipal Code	
66 Inspected post-construction stormwater controls, including structural BMPs, at new development and redevelopment projects? ( <i>Required</i> by February 16, 2010, S5.C.4.c)	Y			

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
66b. Number of sites inspected during the reporting period:		1		
66c. Number of structural BMPs inspected during the reporting period:		1		
66d. Number of enforcement actions taken during the reporting period:		0		
67. Established maintenance standards that are as protective, or more protective, of facility function as those specified in Chapter 4 of Volume V of the <b>2005 Stormwater Management Manual for Western Washington?</b> (Required by February 16, 2010, S5.C.4.c.ii)	Y		Maintenance Standards equivalent to those found in Appendix 1	
68. Performed timely maintenance as per S5.C.4.c.ii? (Required by February 16, 2010, S5.C.4.c.ii)	Y			
68b. Attached documentation of any maintenance delays. (Required by February 16, 2010, S5.C.4.c.ii)	N/A			
69. Established program to annually inspect all stormwater treatment and flow control facilities (other than catch basins) permitted by the Permittee according to S5.C.4.b. unless there are maintenance records to justify a different frequency? (Required by February 16, 2010, S5.C.4.c.iii)	Y			
70. If using reduced inspection frequency, Attached documentation as per S5.C.4.c.iii? (Required by February 16, 2010, S5.C.4.c.iii)	N/A			

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>
71 Inspected all new stormwater treatment and flow control facilities owned or operated, including catch basins, for new residential developments that are a part of a larger common plan of development or sale, every 6 months during the period of heaviest house construction (i.e., 1 to 2 years following subdivision approval) to identify maintenance needs and enforce compliance with maintenance standards as needed? ( <i>Required</i> by February 16, 2010, S5.C.4.c.iv)	Y			
71b. Number of facilities inspected during the reporting period:		2		
72 Implemented a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, other enforcement records, maintenance inspections and maintenance activities? ( <i>Required</i> by February 16, 2010, S5.C.4.d)	Y			
73 Provided copies of the <b>Notice of Intent for Construction Activity</b> and <b>Notice of Intent for Industrial Activity</b> to representatives of proposed new development and redevelopment? (S5.C.4.e)	N/A		No new construction activity within reporting period.	

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
74 All staff responsible for implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement were trained to conduct these activities? (Required by February 16, 2010, S5.C.4.f)	Y			
74b. Number of trainings provided:		1		
74c. Number of staff trained:		1		
75 Developed and implemented an operations and maintenance (O&M) program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations? (Required by February 16, 2010, S5.C.5)	Y		Currently being evaluating as part of the update to the Town's Comp. Stormwater Plan.	
76 Adopted maintenance standards as protective, or more protective, of facility function as those specified in Chapter 4 of Volume V of the 2005 Stormwater Management Manual for Western Washington? (Required by February 16, 2010, S5.C.5.a)	Y		Adopted Volume V of 2005 DOE Manual	
77 Performed timely maintenance as per S5.C.5.a.ii? (Required by February 16, 2010, S5.C.5.a.ii)	Y			
77b. Attached documentation of any maintenance delays. (Required by February 16, 2010, S5.C.5.a.ii)	N/A			

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
78 Designed a program to annually inspect and maintained all stormwater treatment and flow control facilities (other than catch basins)? <i>(Required by February 16, 2010, S5.C.4.c.iii)</i>	Y			
78b. Number of known facilities:		36		
78c. Number of facilities inspected during the reporting period:		36		
79 If using reduced inspection frequency, <b>Attached</b> documentation as per S5.C.5.a.ii? <i>(Required by February 16, 2010, S5.C.5.b)</i>	N/A			
80 Conducted spot checks of stormwater facilities after major storms? <i>(Required by February 16, 2010, S5.C.5.c)</i>	Y			
80b. Number of known facilities:		5		
80c. Number of facilities inspected during the reporting period:		5		
81 Inspected municipally owned or operated catch basins at least once before the end of the Permit term? <i>(Required by February 16, 2010, S5.C.5.d)</i>	Y			
81b. Number of known catch basins:		725		
81c. Number of inspections:		725		
81d. Number of catch basins cleaned:		250		

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, <u>if applicable</u>
82 Established and implemented practices to reduce stormwater impacts associated with runoff from streets, parking lots, roads or highways owned or maintained by the Permittee, and road maintenance activities conducted by the Permittee? <i>(Required by February 16, 2010, S5.C.5.f)</i>	Y			
83 Established and implemented policies and procedures to reduce pollutants in discharges from all lands owned or maintained by the Permittee and subject to this Permit, including but not limited to: parks, open space, road right-of-way, maintenance yards, and stormwater treatment and flow control facilities? <i>(Required by February 16, 2010, S5.C.5.g)</i>	Y			
84 Implemented an operations and maintenance (O&M) program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations? <i>(Required by February 16, 2010, S5.C.5.h.)</i>	Y		Currently being reviewed/ revised as part of re-write of Stormwater Comp. Plan	
84b. Number of trainings provided:		1		
84c. Number of staff trained:		1		

Question	Y/N/ NA	#	Comments (50 word limit)	Name of Attachment & Page #, if applicable
85 Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under the Industrial Stormwater General Permit? <i>(Required by February 16, 2010, S5.C.5.i)</i>	Y			
86 Is there an approved Total Maximum Daily Load (TMDL) applicable to stormwater discharges from a MS4s owned or operated by the Permittee?	N			
87 Complied with the specific requirements identified in Appendix 2? (S7.A)	N/A			
88 <b>Attached</b> status report of TMDL implementation? (S7.A)	N/A			
89 Where monitoring was required in Appendix 2, did you conduct the monitoring according to an approved Quality Assurance Project Plan? (S7.A)	N/A			
90 Took appropriate action to correct or minimize discharges into or from the MS4 which may constitute a threat to human health, welfare, or the environment? (G3)	N/A			
90b. <b>Attached</b> a summary of the status of implementation of any actions taken pursuant to S4.F and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period? (S4.F.3.d)	N/A			

<b>Question</b>	<b>Y/N/NA</b>	<b>#</b>	<b>Comments (50 word limit)</b>	<b>Name of Attachment &amp; Page #, if applicable</b>
91 Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance? (G20)	N/A			
92 Notified Ecology immediately in cases where the Permittee becomes aware of a discharge from the Permittees MS4 which may cause or contribute to an imminent threat to human health or the environment? (G3)	N/A			
93 <b>Attached</b> a summary of identified barriers to the use of low impact development (LID) and measures to address the barriers (Required to be submitted by March 31, 2011, S9.E.4.a)	N			
94 <b>Attached</b> a report describing LID practices currently available and that can be reasonably implemented, potential or planned non-structural actions and LID techniques to prevent stormwater impacts, goals and metrics to identify, promote, measure LID; and schedules to require and implement non-structural and LID techniques on a broader scale (Required to be submitted by March 31, 2011, S9.E.4.b)	Y			

**VII. Information Collection, BMP Evaluation, and Monitoring**

Complete Part A for all annual reports.

NOTE: Please note in Row 1 of the table if you have no information to report.

NOTE: Please limit your entries to 255 characters per cell. You may include additional information in your Supplemental Documentation attachment and reference it below with the page number.

**A. Information Collection**

**Briefly describe any stormwater monitoring, studies, or type of information collected and analyzed during the reporting period. (S8.B.1)**      **Who/how to contact for additional information?**

1.	Continued Implementation of GIS mapping System. Mapping completed and hardware/software is currently being installed on site via Stormwater Comprehensive Plan is currently being re-written (including hydraulic anal.) under contract with Gray & Osborne Inc. (Leigh Nelson/Steve	
2.	Clarke)	
3.		
4.		
5.		
6.		

**VII. Information Collection, BMP Evaluation, and Monitoring**

Complete Part B for all annual reports.

**B. SWMP Evaluation (S8.B & S9)**

You are required to assess the appropriateness of the BMPs you have selected to implement your SWMP. This evaluation is necessary to evaluate whether the MEP standard set by the permit is protective of water quality in your receiving water bodies. This assessment may be entirely qualitative. Answer **NA** if you are not yet implementing BMPs for a component of the SWMP. (S8.B.2 and S9)

Question	Y/N/NA	Comments (50 word limit)
Are the BMPs selected and implemented for Public Outreach appropriate to minimize pollutants in the MS4 to the MEP?	Y	
1. Are the BMPs selected and implemented for Public Involvement appropriate to minimize pollutants in the MS4 to the MEP?	Y	
2. Are the BMPs selected and implemented for Illicit Discharge Detection and Elimination appropriate to minimize pollutants in the MS4 to the MEP?	Y	
3. Are the BMPs selected and implemented for Construction Stormwater Pollution Prevention appropriate to minimize pollutants in the MS4 to the MEP?	Y	
4. Are the BMPs selected and implemented for Post-Construction Runoff Management appropriate to minimize pollutants in the MS4 to the MEP?	Y	
5. Are the BMPs selected and implemented for Good Housekeeping for Municipal Operations appropriate to minimize pollutants in the MS4 to the MEP?	Y	
6. Are the BMPs selected and implemented for Good Housekeeping for Municipal Operations appropriate to minimize pollutants in the MS4 to the MEP?	Y	

**VII. Information Collection, BMP Evaluation, and Monitoring**

Complete Part C for all annual reports.

**C. Changes in BMPs or objectives (S8:B)**

If any of the BMPs or objectives is being changed, list the old BMP and objective, the new BMP and objective, and a justification for the change below. (S8.B.2., and S9)

NOTE: You may choose to attach additional documentation justifying Changes in BMPs or objectives. Note such attachments in the *Justification for change* field.

	<b>Old BMP</b>	<b>Old Objective</b>	<b>New BMP</b>	<b>New Objective</b>	<b>Justification for Change</b>
1					
2					
3					
4					
5					
6					
7					

**Town of Steilacoom 2010 Annual Report  
Low Impact Development Implementation  
May 2011**

The following report produced by the Town of Steilacoom is intended to provide Ecology with additional input and to better prepare the Town to implement LID requirements that are expected in the upcoming permit cycle. Please note that listing an action in this report does not constitute a commitment to implement suggested changes. The Town of Steilacoom intends to wait for further direction from the Department of Ecology for specific implementation and deadline requirements.

*Special condition S9.E.4 of the modified permit requires the permittee to submit with the Annual Report information that includes:*

- *A Summary of Identified Barriers to the use of Low Impact Development (LID) within the area covered by the permit and measures to address the barriers.*
  
- *A Report Describing:*
  - *LID practices that are currently available and that can reasonably be implemented within this permit term.*
  
  - *Potential or planned non-structural actions and LID techniques to prevent stormwater impacts.*
  
  - *Goals and metrics to identify, promote, and measure LID use.*
  
  - *Potential or planned schedules for the permittee to require and implement the non-structural and LID techniques on a broader scale in the future.*

**Background:**

The February 2, 2009 Pollution Control Hearings Board (PCHB) ruling on an appeal of the Phase II Municipal Stormwater Permit required that Ecology begin to prepare Western Washington Phase II permittees for future implementation of Low Impact Development (LID). On June 17, 2009 Ecology modified the Phase II Western Washington permit conditions to add reporting requirements on advancing the use of low impact development practices in new development and redevelopment.

In October 2009, Ecology convened a stakeholder advisory process to provide input on LID requirements that are expected to be incorporated into the next permit cycle. The stakeholder committee worked closely with Ecology to define the scope of low impact development techniques, criteria for determining the feasibility of LID techniques, performance standards, and a timeline for future implementation. At the final meeting of the LID advisory process on August 12, 2010, Ecology presented a draft LID proposal outline.

The process of permit reissuance includes a number of opportunities for public input. Ecology plans to issue a draft permit in Spring of 2011 for public review and comment and over a two year review process, will make final decisions on LID permit requirements. Likewise, the Town will provide opportunities for public input on potential LID goals and objectives through the formulation of the Stormwater Comprehensive Plan.

**Analysis:**

The following analysis is based on currently adopted documents. Because the Town of Steilacoom is currently in the process of updating the Town of Steilacoom Stormwater Comprehensive Plan, many of the identified barriers, practices, goals and actions related to LID implementation in this report will provide guidance for particular areas within the Comprehensive Plan related to LID. As additional guidance from Ecology is obtained, modifications to the Stormwater Comprehensive Plan may be necessary.

**Identified Barriers and Measures to Address Them**

The primary barrier to LID Techniques in the Town of Steilacoom is environmental, (the geology). The soils in the Town vary significantly from site to site. Some areas of Town lend themselves to several of the LID non-structural techniques, whereas other areas do not contain soils compatible for the implementation of some non-structural LID provisions. Additional scientific geotechnical evaluations of the various areas of Town, coupled with the specific mapping of these areas would identify potential areas where LID techniques are most likely to succeed or fail. This additional information could be used to create provisions for LID implementation and revisions to the Steilacoom Municipal Code to encourage the use of LID techniques.

**Practices, Goals, Planned Actions and Timelines**

**LID Practices Currently Available**

The Town encourages the use of the following LID practices when conditions make it a feasible option:

- The use of infiltration facilities, where feasible.
- Encouraging the preservation of natural vegetation, both during and upon completion of development (Goal 2, LU Policy 2.1, 2.3)
- Clustering development by allowing flexibility in density when preserving sensitive/critical areas (Goal 4, LU Policy 4.2).
- Encouragement of in-fill development as a way of preserving existing natural areas while allowing for growth potential.

## **Potential Non-Structural Actions and LID Techniques**

Low Impact Development principles and applications present a significant conceptual shift in storm water management. Conventional tools to manage storm water emphasize collection and conveyance of storm water while LID is a strategy that emphasizes conservation and use of existing features to mimic natural hydrology.

In the future, the Town may consider adopting additional policies to further advance the Implementation of LID practices such as:

- Advancing our existing incentive-based program to promote the use of LID
- Increasing flexibility to allow for more experimental designs
- Encourage the use of pervious materials
- Continuing allowing for alternative building designs to reduce footprint and disturbed areas
- Changes to Site planning and layout that takes advantage of natural features
- Additional programs to encourage Infill and redevelopment to reduce creation of new impervious surfaces

## **Goals and Metrics to Identify, Promote, and Measure LID Use**

Ecology recommends that permittees provide indicators of progress in implementing LID techniques identified in this report. Permittees should identify goals for expanding the use of LID and establish methods for achieving these goals.

As we wait for Ecology to develop the anticipated LID requirements for the next permit, the Town of Steilacoom plans to focus on public education and voluntary implementation of LID structural and non-structural components.

Elected Officials and the Public - LID is a relatively new concept. There is a general perception that LID is not proven and that the technology is untested. It would be beneficial to highlight local LID projects that have been successful and encourage various groups and elected officials to visit various demonstration LID projects in the region. This may provide useful if/when LID requirements are considered locally in the future.

Developers - Developers that are more knowledgeable in LID will produce better products for review (during permit review process). City staff will provide brochures and/or pamphlets illustrating the benefits provided by LID, the uses of LID, and the types of LID techniques available.

Regional Collaboration - Collaboration and sharing of information among local municipalities would be very beneficial. The Town of Steilacoom will support and participate in local forums where permittees can share strategies for

successfully implementing LID and share LID accomplishments and lessons learned.

### **Timeline to Implement LID Techniques on a Broader Scale in the Future**

The Town of Steilacoom anticipates that Ecology will outline very specific deadlines for implementation of LID requirements in the next permit cycle. At this point in time it is difficult to generate an implementation schedule before knowing what changes will be necessary within the Town's codes, development standards, comprehensive plan, and other policies in order to meet future NPDES permit requirements. The Town intends to comply with deadlines in the next permit that Ecology determines feasible.

**Town of Steilacoom 2010 Annual Report  
Preparation for Future, Long Term  
SWMP Effectiveness Monitoring  
May 2011**

The following report produced by the Town of Steilacoom is intended to provide Ecology with a report identifying at least two suitable questions and selected sites where monitoring will be conducted in the future, (S8.C b).

Special condition S8.C b ii of the modified permit specifically requires the following:

**S8.C.b SWMP Effectiveness Monitoring**

*No later than December 31, 2010, each city, town and county shall identify at least two suitable questions and select sites where monitoring will be conducted. This monitoring shall include, at a minimum, plans for stormwater, sediment or receiving water monitoring of physical, chemical and/or biological characteristics. This monitoring may also include data collection and analysis of other measures of program effectiveness, problem identification and characterizing discharges for planning purposes.*

*iii. For each question, the Permittee shall develop a monitoring plan containing the following elements:*

*A statement of the question, an explanation of how and why the issue is significant to the Permittee, and a discussion of whether and how the results of the monitoring may be significant to other MS4s.*

**QUESTION 1:**

**Does the development of an in-stream monitoring program for the 5<sup>th</sup> St. Waterway result in measurable improvements in water quality to the waterway?**

**EXPLANATION:**

The 5<sup>th</sup> St. Waterway, as mapped in the Town of Steilacoom Stormwater Comprehensive Plan is comprised primarily of drainage originating from the entire southwest quadrant of the Town. The Waterway originates in Farrell's Marsh which is publicly owned. As water drains from the Marsh heading toward Puget Sound (the headwaters of the Waterway), the "stream" accumulates additional stormwater runoff from surrounding properties and streets as it heads toward its outfall at a small, unnamed estuary near 5<sup>th</sup> St. and Martin St. With this in mind, the Town suggests commencement of a sustainable, long term monitoring program to determine the current overall water quality of the waterway and ascertain if specific Best Management Practices can/should be employed to improve water quality. Town staff is planning to partner

with local volunteers to conduct the monitoring and provide education and outreach to nearby residences and businesses. The goals of the basic monitoring program are to educate homeowners and the public about stormwater and waterways such as this, as well as to collect baseline and ongoing data to uncover trends to assist Town staff in making management decisions.

*A specific hypothesis about the issue or management actions that will be tested.*

Current mapping of surrounding public and private stormwater systems feeding into the 5<sup>th</sup> St. Waterway indicate there are approximately three sub-basins draining into it. Approximately two hundred individual parcels are located within the basin. As a result, the waterway is affected by both water quality and quantity of the sub-basins feeding into it, as well as by human activity and land use practices within the sub-basins and basin as a whole. The waterway monitoring program will be helpful in evaluating Public Education and Outreach (S5.C.1) that has been provided and is to be provided by Town staff. It is also expected that the program will increase Public Involvement and Participation (S5.C.2) as well as the potential to increase public awareness in the area of Illicit Discharge Detection and Elimination (IDDE-S5.C.3). In consideration of the above, it is hypothesized that a monitoring program will lead to a decrease in contaminants entering the waterway and result in an improvement in water quality.

*Specific parameters or attributes to be measured.*

Parameters:

- Dissolved oxygen (DO)
- Water Temperature
- Total Phosphorus
- Heavy metals
- Fecal coliform
- Nitrates
- Air temperature and weather

NOTE: Water chemistry and the physical characteristics will vary seasonally as well.

Equipment Required:

- YSI 55 Dissolved Oxygen & Temperature meter
- Sample bottles
- Armored thermometer

Laboratory Testing:

- Water Management Laboratories  
1515 80<sup>th</sup> St E  
Tacoma, WA 98404  
253-531-3121

Monitoring Sites:

Two sites have been identified for this monitoring effort. The first site would be at the “headwaters” of the Waterway, located at Farrell’s Marsh in Steilacoom. This site would provide the baseline water quality of the water leaving the Marsh and heading downstream through the basin. The second monitoring site would be on Martin St. at Fifth St., just before the accumulated water from the basin empties into Puget Sound.

Monitoring Tests, Frequency and Anticipated Costs:

<u>Test</u>	<u>Frequency</u>	<u>Cost/Test</u>	<u>Total Cost</u>
Total phosphorous	bi-monthly	\$ 48.00	\$ 288.00
Heavy metals	bi-monthly	\$ 65.00	\$ 390.00
Fecal coliform	bi-monthly	\$ 50.00	\$ 300.00
Nitrates	bi-monthly	\$ 50.00	\$ 300.00

Training:

The training provided by the Town will include an overview of stream ecology, the importance of tracking stream conditions, as well as a demonstration of monitoring equipment, handling and use.

*Expected modifications to management actions dependent on the outcome of hypothesis testing.*

Implementation of the waterway monitoring program is expected to give more direction to the types of public outreach and education provided by Town staff. Results from the program may also lead to expanded monitoring activities to better identify problems and solutions related to the waterway. Results may also influence the more directed surveillance of potential IDDE sources.

*A statement of the question, an explanation of how and why the issue is significant to the Permittee, and a discussion of whether and how the results of the monitoring may be significant to other MS4s.*

**QUESTION 2:**

**Does the creation/installation of a computer based GIS system increase the effectiveness of the overall stormwater system maintenance and management in the Town, resulting in increased water quality throughout all drainage basins within the Town’s jurisdiction?**

EXPLANATION:

Until recently, the Town of Steilacoom has relied on a manual recordkeeping system to track the maintenance and management of the Town’s stormwater system. This manual system included limited information on conveyance systems, outfalls, detention systems, etc. The Town is currently embarking on a project to create a GIS based mapping system. This system is intended to provide up to date, survey grade information about the entire inventory of the stormwater system. Additionally, this system is being designed to incorporate maintenance of the system as well. We believe this system will not only provide more accurate information, but will also lead to a more consistent, uniform approach to maintenance of the system by our crews. This system will also provide accurate topographical information, locations of sensitive areas and other information that will provide staff with enhanced tools to determine the best management practices to be deployed on specific sites.

*Specific hypothesis about the issue or management actions that will be tested.*

We believe that the development and implementation of a comprehensive, computer based mapping system with a maintenance component will result in a better managed maintenance program, and in turn will provide an increase in the overall water quality of stormwater system-wide over time. Through use of a database, the mapping product will be tied to a maintenance logging system, whereby crewmembers can track and record maintenance on individual conveyance systems, basins, control structures, swales and other pollution prevention devices as the work is completed. This approach, coupled with measurable sampling as detailed in question #1 above will provide the crew with a mechanism for measuring their success and a tool for adjusting maintenance focus as needed.

*Specific parameters or attributes to be measured.*

Parameters:

- Sediment deposits within basins and conveyance pipe sections.
- Phosphorus (at 5 outfalls)
- Heavy metals (at 5 outfalls)

Equipment Required:

- YSI 55 Dissolved Oxygen & Temperature meter
- Sample bottles
- Armored thermometer

Laboratory Testing:

Water Management Laboratory, Inc.  
1515 80<sup>th</sup> St E, Tacoma, WA 98404,            253-531-3121

Monitoring Sites:

1. Cedar St. Waterway at Lafayette St.
2. Chambers St. Waterway at Rainier St.
3. Farrell's Dr. at Randolph St.
4. Jackson St. at 3<sup>rd</sup> St.
5. Chambers Creek Rd. at Sunnyside Park

Monitoring Tests, Frequency and Anticipated Costs:

Test	Frequency	Cost/Test	Total Cost
Sedimentation	semi-annually	\$0.00 (during cleaning)	\$0.00
Phosphorus	semi-annually	\$48.00	\$96.00
Heavy Metals	semi-annually	\$65.00	\$130.00

*Expected modifications to management actions depending on the outcome of the hypothesis testing.*

Depending on the results, frequency of cleaning particular sections, basins, etc. may be increased to improve specific results at specific locations. Results will be analyzed internally and adjustments to crew schedules will be adjusted accordingly. If non-point pollution appears to be a contributing factor, attempts will be made to identify and eliminate the sources of pollution consistent with this plan and the provisions of the Ecology Manual.

TOWN OF STEILACOOM  
2010 STORMWATER MANAGEMENT  
PROGRAM (SWMP)

---

March, 2010

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# 1. INTRODUCTION

## 1.1 Overview and Background

The National Pollutant Discharge Elimination System (NPDES) permit program is a requirement of the federal Clean Water Act, which is intended to protect and restore waters for “fishable, swimmable” uses. The Federal Environmental Protection Agency (EPA) has delegated permit authority to state environmental agencies. In Washington, the NPDES-delegated permit authority is the Washington State Department of Ecology (Ecology).

Municipalities with a population of over 100,000 (as of the 1990 census) have been designated as Phase I communities and must comply with Ecology’s Phase I NPDES Municipal Stormwater Permit. Steilacoom has a current population of 6,245, categorically placing the Town within the Phase II Municipal Stormwater Permit requirements. About 100 other municipalities in Washington must now comply with the Phase II Permit, along with Steilacoom, as operators of small municipal separate storm sewer systems (MS4s).

The Permit allows municipalities to discharge stormwater runoff from municipal drainage systems into the State’s waterbodies (i.e., streams, rivers, lakes, wetlands) as long as municipalities implement programs to protect water quality by reducing the discharge of “non-point source” pollutants to the “maximum extent practicable” (MEP) through application of Permit-specified “best management practices” (BMPs). The practices specified in the Permit are collectively referred to as the Stormwater Management Program (SWMP) and grouped under the following components:

- Public Education and Outreach
- Public Involvement
- Illicit Discharge Detection and Elimination
- Controlling Runoff from Development, Redevelopment, and Construction Sites
- Pollution Prevention and Municipal Operation and Maintenance
- Monitoring

The Permit requires the Town to report annually (March 31<sup>st</sup> of each year) on progress in SWMP Program implementation for the prior year. The Permit also requires submittal of documentation that describes proposed SWMP Program activities for the coming year. Implementation of various Permit conditions is phased throughout the five-year Permit term from February 16, 2007 through February 15, 2012. The Permit will be revised and reissued at the end of this period.

This report is the Town of Steilacoom’s Draft Stormwater Management Program (SWMP) document. The remainder of this 2010 SWMP document describes actions Steilacoom will take to maintain compliance over the third year of the Permit term (i.e., February 16, 2010 through February 16, 2011).

## 1.2 Phased Permit Requirements

Ecology began work on the Phase II Municipal Stormwater Permit for Western Washington in the fall of 2004 and posted a preliminary draft for public comment on May 16, 2005. Ecology released a formal draft of the Permit in February 2006 and issued the final Permit on January 17, 2007. The Permit issued by Ecology became effective on February 16, 2007 and expires on February 15, 2012.

Ecology is phasing in many of the Permit requirements over the five-year Permit term. On March 31 of each year, beginning in 2008, the Town must:

1. Submit its SWMP document to Ecology describing compliance activities planned for the coming year.
2. Submit an annual report documenting Permit compliance activities for the previous calendar year.
3. Post the SWMP document and annual report on the web.

This SWMP document includes the following attachments:

- Appendix A - Acronyms and Definitions from the Permit.

The Western Washington Phase II Municipal Stormwater Permit and additional information can be found on Ecology's website:

[http://www.ecy.wa.gov/programs/wq/stormwater/municipal/phase\\_ii\\_ww/ww\\_ph\\_ii-permit.html](http://www.ecy.wa.gov/programs/wq/stormwater/municipal/phase_ii_ww/ww_ph_ii-permit.html).

## 1.3 Department Responsibilities

The Permit requirements affect departments across the Town organization. As the Town is fairly small geographically and all departments work closely together, implementation of various permit sections (requirements) will be coordinated through the Town Management Team (consisting of the Town Administrator, Public Works Director and Public Safety Chief) and implemented via employees under each department director's direct supervision. Overall management of the individual components of the Plan will be the responsibility of the Public Works Director.

## 1.4 Total Maximum Daily Load (TMDL) Compliance Issues

Stormwater discharges covered under the Permit are required to implement actions necessary to achieve the pollutant reductions called for in applicable TMDLs. Applicable TMDLs are TMDLs which have been approved by the EPA before the issuance date of the permit or which have been approved by the EPA prior to the date the permittee's application is received by Ecology. Information on Ecology's TMDL program is available on Ecology's website at [www.ecy.wa.gov/programs/wq/tmdl](http://www.ecy.wa.gov/programs/wq/tmdl).

All TMDLs approved by EPA before February 15, 2006, were reviewed by Ecology to determine whether stormwater including municipal stormwater sources were identified in the TMDL. When most of these TMDLs were developed, municipal stormwater was considered a subset of non-point discharges, rather than a permitted discharge. As a result, very few TMDLs statewide contain requirements for municipal stormwater sources. Few TMDLs completed to date have

established load allocations or waste load allocations for municipal stormwater discharges covered under the Permit. Ecology is interpreting TMDL requirements as follows:

- For TMDLs where stormwater was not identified as a source of the pollutants of concern, or if all of the sources were defined in the TMDL, Ecology considers the MS4 not to be a significant contributor of pollutants.
- Where stormwater was identified as a source of pollutants and the TMDL or implementation plans developed to support the TMDL identified control measures were less than or equivalent to the requirements of this permit, Ecology sets a narrative effluent limit: “compliance with the permit compliance constitutes compliance with the TMDL.”
- If stormwater was identified as a source of pollutants and specific WLAs, LAs or control measures were established, Ecology must develop effluent limits in addition to the other requirements of the permit. These effluent limits may be narrative or numeric depending on the control measures set by the TMDL or implementation plans.

Where a TMDL or the detailed implementation plan developed for the TMDL identifies actions or activities beyond what is required by this permit, Ecology has identified the additional requirements in Appendix 2 of the permit for all TMDLs approved by EPA prior to February 15, 2006. Appendix 2 of the permit lists the cities and counties affected by the TMDL.

Steilacoom has not been listed in Appendix 2.

### 1.5 Document Organization

The content in this document is based upon Permit requirements and Ecology’s Draft Guidance for City and County Annual Reports for Western Washington Phase II Municipal Stormwater Permits. The remainder of the Stormwater Management Program document is organized similarly to the Permit:

- **Section 2.0** addresses Permit requirements for administration of the Town’s Stormwater Management Program for 2010.
- **Section 3.0** addresses Permit requirements for Public Education and Outreach for 2010.
- **Section 4.0** addresses Permit requirements for Public Involvement and Participation for 2010.
- **Section 5.0** addresses Permit requirements for Illicit Discharge Detection and Elimination for 2010.
- **Section 6.0** addresses Permit requirements for Controlling Runoff from New Development, Redevelopment and Construction Sites for 2010.
- **Section 7.0** addresses Permit requirements for Pollution Prevention and Operation and Maintenance for Municipal Operations for 2010.
- **Section 8.0** addresses Permit requirements for the Water Quality Monitoring section of the Permit for 2010.

Each section includes a summary of the relevant Permit requirements and a description of current and planned compliance activities.

## 2. STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

This Section describes Permit requirements related to overall Stormwater Management Program administration, including current and planned compliance activities.

### 2.1 Permit Requirements

The Permit (Section S5.A) requires the Town to:

- Develop and implement a Stormwater Management Program and prepare written documentation (SWMP document) for submittal to Ecology on March 31, 2008; and update the SWMP annually thereafter. The purpose of the Stormwater Management Program is to reduce the discharge of pollutants from the municipal stormwater system to the maximum extent practicable (MEP) thereby protecting water quality. The Stormwater Management Program is to include the actions and activities described in Sections 3 through 8 of this SWMP document.
- Submit annual reports beginning in 2008 to Ecology by March 31<sup>st</sup> (for the previous calendar year). These reports are to summarize SWMP implementation status and present information from assessment and evaluation activities conducted during the reporting period.

### 2.2 Current Activities

The Town currently has in place activities and programs that meet the Permit requirements. Current activities associated with the above Permit requirements include:

- The Town is on track to submit the SWMP documentation by March 31, 2010. The Public Works Department is currently leading Town development of the future planned activities.
- The Town has set up the systems for tracking training.
- The Town has defined its strategy for cost tracking.
- The Town is on track to submit the third Annual Report and SWMP by March 31, 2010.

### 2.3 Planned Activities

Steilacoom has positioned itself well to maintain compliance as Ecology phases in the future Permit deadlines. Table 2-1 presents the proposed work plan for the 2010 SWMP administration activities. These tasks were developed through an iterative process of interviews and workshops with staff from affected Town departments.

<b>Table 2-1. 2010 Stormwater Management Administration Program Work Plan</b>			
<b>Task ID</b>	<b>Task Description</b>	<b>Lead</b>	<b>Schedule Notes</b>
SWMP-1	Refine and implement NPDES cost accounting strategy for time spent on each component of Permit.	Finance	Cost tracking procedures in place by 1/01/2010.
SWMP-2	Refine and implement training tracking procedures and systems.	Public Works	First training was completed by 3/12/2009.
SWMP-3	Summarize annual activities for "Stormwater Management Program" component of Annual Report; identify any updates to SWMP document.	Public Works	The SWMP and Annual Compliance Report are due on or before March 31st of each year.

# TOWN OF STEILACOOM 2010 STORMWATER MANAGEMENT PROGRAM

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## 3. PUBLIC EDUCATION AND OUTREACH

This Section describes the Permit requirements related to Public Education and Outreach, including current and planned compliance activities.

### 3.1 Permit Requirements

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

- Prioritize and target education and outreach activities to specified audiences, including general public, businesses, residents/homeowners, landscapers, property managers, engineers, contractors, developers, review staff and land use planners and other Town employees to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.
- Have an outreach program that is designed to achieve measurable improvements in the target audience's understanding of the problem and what they can do to solve it.
- Track and maintain records of public education and outreach activities.

### 3.2 Current Activities

The Town is currently developing an Education and Outreach program for stormwater-quality related topics. The Town has performed some public education and outreach regarding water quality problems in the past to include stenciling and installation of storm drain marker medallions by student and community service organizations. The Town will track additional activities as they are implemented throughout 2010.

### 3.3 Planned Activities

The Town plans on building its Education and Outreach program in 2010. Steilacoom may be able to take advantage of regional efforts intended to meet NPDES permit requirements, thereby reducing Town efforts and costs.

Table 3-1 is the work plan for 2010 SWMP public education and outreach activities. These tasks were developed through an iterative process of interviews and workshops with staff from affected Town departments.

<b>Table 3-1. 2010 Public Education and Outreach Work Plan</b>			
<b>Task ID</b>	<b>Task Description</b>	<b>Lead</b>	<b>Schedule Notes</b>
EDUC-1	Develop education and outreach plan. Begin implementing appropriate activities.	Town Management	Continue development of education and outreach plan and implementation of activities throughout 2010.
EDUC-2	Develop strategy and process to evaluate understanding and adoption of target behaviors.	Town Management	
EDUC-3	Summarize annual activities for "Public Education and Outreach" component of Annual Report; identify any updates to SWMP document.	Town Management	The SWMP and Annual Report submittal is due on or before March 31st of each year.

# TOWN OF STEILACOOM 2010 STORMWATER MANAGEMENT PROGRAM

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## 4. PUBLIC INVOLVEMENT

This Section describes the Permit requirements related to Public Involvement, including current and planned compliance activities.

### 4.1 Permit Requirements

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

- Provide ongoing opportunities for public involvement through advisory boards and commissions, watershed committees, public participation in developing rate structures and budgets, stewardship programs, environmental activities or other similar activities. The public must be able to participate in the decision-making processes involving the development, implementation and update of the Stormwater Management Program.
- Make the SWMP document and Annual Report available to the public, including posting on the Town's website. Make other documents required to be submitted to Ecology in response to Permit conditions available to the public.

### 4.2 Current Activities

The current compliance activities associated with the above Permit requirements include:

- The Town implemented a series of public involvement activities intended to meet the Permit requirements for public involvement in development of its first SWMP. This process involved presentations to the Town Administrator and Town Council at sessions open to the public.
- The Town defined its process for annual SWMP updates, which includes discussions at sessions open to the public and workshops/council meetings before the Steilacoom Town Council.
- The Town posted the 2009 Annual Report on the Town website.

### 4.3 Planned Activities

Steilacoom will offer the public opportunities to be involved in the decision making process on stormwater issues. Actions recommended for continued compliance include:

- Make most current SWMP document and Annual Report available to public by posting on the Town website.
- The Town summarizes associated activities in its Annual Report by March 31<sup>st</sup> of each year
- The Town will develop an update to the current Comprehensive Stormwater Management Plan including a public involvement process.

Table 4-1 is the work plan for 2010 SWMP public involvement activities. These tasks were developed through an iterative process of interviews and workshops with staff from affected Town departments.

<b>Table 4-1. 2010 Public Involvement Work Plan</b>			
<b>Task ID</b>	<b>Task Description</b>	<b>Lead</b>	<b>Schedule Notes</b>
PI-1	Provide public involvement opportunities for annual SWMP and Stormwater Comprehensive Plan updates.	Town Management	Public involvement opportunities will be available throughout 2010.
PI-2	Make SWMP document and Annual Report available to public by posting on the Town's website.	Town Management	
PI-3	Summarize annual activities for "Public Involvement and Participation" component of Annual Report; identify any updates to SWMP document.	Town Management	The SWMP and Annual Report submittal is due on or before March 31st of each year.

# TOWN OF STEILACOOM 2010 STORMWATER MANAGEMENT PROGRAM

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## 5. ILLICIT DISCHARGE DETECTION AND ELIMINATION

This Section describes the Permit requirements related to Illicit Discharge Detection and Elimination (IDDE), including current and planned compliance activities.

### 5.1 Permit Requirements

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

- Implement an ongoing program to detect and remove illicit discharges, connections and improper disposal, including any spills into the municipal separate storm sewers owned or operated by the Town. An illicit discharge means “any discharge to a municipal storm system that is not composed entirely of stormwater...” and illicit connection means “any man-made conveyance that is connected to a municipal storm system without a permit (excluding roof drains and other similar type connections) such as sanitary sewer connections, floor drains, etc.”
- Develop a storm sewer system map, have ordinances that prohibit illicit discharges, and create a program to detect and address illicit discharges.
- Publicly list and publicize a hotline or other local telephone number for public reporting of spills and other illicit discharges. Track illicit discharge reports and actions taken in response through close-out, including enforcement actions.
- Train staff on proper IDDE response procedures and processes and to recognize and report illicit discharges.
- Summarize all illicit discharges and connections reported to the Town and response actions taken, including enforcement actions, in the Annual Report; including updates to the SWMP document.

### 5.2 Current Activities

The Town currently implements activities and programs that meet many of the Permit requirements. The current compliance activities associated with the above Permit requirements include:

- The Town currently has an IDDE program.
- The Town has an emergency phone number posted on the Town’s website that allows citizens to report illicit discharges or illicit dumping.
- The Town is currently developing its own geographic information system (GIS) and has created a draft electronic database of the Town’s storm system. The Town is in the process of creating a GIS strategic plan to outline all necessary data requirements for the future.
- Town codes and standards have sections that address some illicit discharges and civil infractions.

- The Town summarizes associated activities in its Annual Report by March 31<sup>st</sup> of each year.
- The Town has received a Department of Ecology grant and is using the funds to develop a GIS map of the Town's storm sewer system. This work is approximately 80% complete and is anticipated to be completed by December, 2010.

### 5.3 Planned Activities

Steilacoom conducts some illicit discharge detection and elimination activities but will need to expand current efforts in order to maintain compliance as Ecology phases in Permit requirements. Table 5-1 is the work plan for 2010 SWMP illicit discharge detection and elimination activities. These tasks were developed through an iterative process of interviews and workshops with staff from affected Town departments.

<b>Table 5-1. 2010 Illicit Discharge Detection and Elimination Work Plan</b>			
<b>Task ID</b>	<b>Task Description</b>	<b>Lead</b>	<b>Schedule Notes</b>
IDDE-1	Define and implement Town-wide IDDE Program and develop any necessary supplemental IDDE activities.	Public Works O&M	Program development to be completed throughout 2010.
IDDE-2	Using existing GIS inventory, finalize initial storm drain GIS layers.	Public Works, Consultant	Continue through 2010.
IDDE-3	Revise current IDDE response process into a standard, Town-wide IDDE response and enforcement process and procedure.	Public Works, Legal	Implementation of enforcement strategy throughout 2010.
IDDE-4	Review and update IDDE codes as needed to address Permit requirements.	Public Works, Legal	Ordinance and code updates adopted throughout 2010.
IDDE-5	Publicize hotline for public reporting of spills and other illicit discharges.	Town Management, IT	Throughout 2010.
IDDE-6	Incorporate new hotline into tracking/resolution system.	IT, Public Works O&M	Implement tracking system by 2/16/2010.
IDDE-7	Ongoing training of municipal field staff on the identification, investigation, termination, cleanup, and reporting of illicit discharges, improper disposal and illicit connections.	Public Works O&M	Training program, including training tracking, must be developed by 6/30/2010.

IDDE-8	Incorporate awareness of illicit discharges into public outreach and education program.	Town Management	Periodic information published in Town newsletter (The Around Town).
IDDE-9	Summarize annual activities for "Illicit Discharge Detection and Elimination" component of Annual Report; identify any updates to SWMP document.	Public Works O&M	The SWMP and Annual Report submittal is due on or before March 31st of each year.

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6. CONTROLLING RUNOFF FROM NEW DEVELOPMENT,  
REDEVELOPMENT AND CONSTRUCTION SITES

This Section describes the Permit requirements related to Controlling Runoff from New Development, Redevelopment and Construction Sites, including current and planned compliance activities.

6.1 Permit Requirements

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

- Develop, implement, and enforce a program to reduce pollutants in stormwater runoff (for example, sediment, construction site wastes, and illicit discharges) to the municipal separate storm sewer system from new development, redevelopment and construction site activities. The program must apply to both private and public projects, including roads, and address all construction/development-associated pollutant sources.
- Adopt regulations (codes and standards) and implement plan review, inspection, and escalating enforcement processes and procedures necessary to implement the program in accordance with Permit conditions, including the minimum technical requirements in Appendix 1 of the Permit (i.e., 2005 Ecology Stormwater Management Manual for Western Washington, equivalent Phase I Manual or one of the Manual options with a Steilacoom-specific basin-planning overlay).
- Provide provisions and processes and procedures (plan review, inspection, and enforcement) to allow non-structural preventive actions and source reduction approaches such as Low Impact Development techniques (LID), measures to minimize the creation of impervious surfaces and measures to minimize the disturbance of native soils and vegetation.
- Adopt regulations (codes and standards) and provide provisions to verify adequate long-term operations and maintenance of new post-construction permanent stormwater facilities and best management practices (i.e., private drainage system inspections) in accordance with Permit conditions, including an annual inspection frequency and/or approved alternative inspection frequency and maintenance standards for private drainage systems as protective as those in Chapter IV of the 2005 Ecology Stormwater Management Manual for Western Washington.
- Provide training to staff on the new codes, standards, processes and procedures and create public outreach and education materials.
- Develop and define a process to record and maintain all inspections and enforcement actions by staff for inclusion in the Annual Report.
- Summarize annual activities for the “Controlling Runoff” component of the Annual Report; identify any update to SWMP document.

6.2 Current Activities

The Town currently has activities and programs that meet many of the Permit requirements. Current compliance activities associated with the above Permit requirements include:

- The Town has developed and implemented a program to reduce pollutants in stormwater runoff to the municipal separate storm sewer system from some development and construction site activities. The Town enforces this program through the Civil Code.
- The Town requires submittal of Erosion and Sediment Control (ESC) plans and stormwater management plans (i.e., for post-construction, permanent site drainage, and water quality facilities).
- The Town conducts construction and stormwater site inspections during the pre-construction and construction phases.
- The Town provides copies of Notices of Intent (NOI) for construction and industrial activities during the permit review process with developers.
- The Town summarizes associated activities in its Annual Report by March 31<sup>st</sup> of each year.

6.3 Planned Activities

Steilacoom has a program to help reduce stormwater runoff from new development and construction sites but updates will be necessary to maintain compliance as Ecology phases in Permit requirements. Table 6-1 is the work plan for 2010 SWMP activities related to control of runoff from new development, redevelopment and construction sites. These tasks were developed through an iterative process of interviews and workshops with staff from affected Town departments.

<b>Table 6-1. 2010 Controlling Runoff from Development, Redevelopment, and Construction Sites Work Plan</b>			
<b>Task ID</b>	<b>Task Description</b>	<b>Lead</b>	<b>Schedule Notes</b>
CTRL-1	Adopt Appendix 1 of the 2005 Stormwater Manual.	Public Works	Adopted by 5/31/2010.
CTRL-2	Review/revise code language for managing stormwater runoff from development, redevelopment, and construction sites.	Public Works, Planning, Legal	Completed by 9/30/2010.
CTRL-3	Incorporate new standards into permitting process.	Public Works, Planning	Completed by 9/30/2010.
CTRL-4	Refine system for project record keeping regarding plan review, construction site inspections, and enforcement actions.	Public Works, Planning	Ongoing tracking of inspections and enforcement actions.

CTRL-5	Provide ongoing training of staff responsible for implementing the controlling runoff program from new development, redevelopment, and construction sites.	Public Works	Training conducted throughout 2010.
CTRL-6	Summarize annual activities for "Controlling Runoff from New Development, Redevelopment, and Construction Sites" component of Annual Report; identify any updates to SWMP document.	Building, Public Works O&M	The SWMP and Annual Report submittal is due on or before March 31st of each year.

## TOWN OF STEILACOOM 2010 STORMWATER MANAGEMENT PROGRAM

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### 7. POLLUTION PREVENTION AND OPERATION AND MAINTENANCE FOR MUNICIPAL OPERATIONS

This Section describes the Permit requirements related to Pollution Prevention and Operation and Maintenance for Municipal Operations, including current and planned compliance activities.

#### 7.1 Permit Requirements

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

- Develop and implement an operations and maintenance (O&M) program with the ultimate goal of preventing or reducing pollutant runoff from the municipal separate stormwater system and municipal operations and maintenance activities.
- Establish maintenance standards for the municipal separate stormwater system that are at least as protective as those specified in the 2005 *Stormwater Management Manual for Western Washington*.
- Perform inspection of stormwater flow control and treatment facilities and catch basins at the required frequencies, unless previous inspection data show that a reduced frequency is justified.
- Have processes and procedures in place to reduce stormwater impacts associated with runoff from municipal operation and maintenance activities for streets, parking lots, roads or highways owned or maintained by the Town, and to reduce pollutants in discharges from all lands owned or maintained by the Town.
- Train staff to implement the modified processes and procedures and document that training.
- Prepare Stormwater Pollution Prevention Plans (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Town.
- Summarize annual activities for the “Pollution Prevention and Operations and Maintenance for Municipal” component of the Annual Report; identify any update to SWMP document.

#### 7.2 Current Activities

The Town currently has activities and programs that meet some of the Permit requirements. The current compliance activities associated with the above Permit requirements include:

- The Town has a program for catch basin and inlet inspections.
- Many of the Town’s landscape, open space, and facility management activities are managed to minimize the potential for stormwater pollution.
- The Town has created a list of Town owned properties that will need Stormwater Pollution Prevention Plans (SWPPP).
- The Town summarizes associated activities in its Annual Report by March 31<sup>st</sup> of each year.

## 7.3 Planned Actions

Steilacoom performs many activities to limit stormwater pollution potential related to its municipal operations and maintenance program. Updates will be necessary to maintain compliance as Ecology phases in Permit requirements. Preparing for upcoming requirements due in early 2010 will be necessary. Table 7-1 is the work plan for 2010 SWMP activities related to pollution prevention and operations and maintenance activities. These tasks were developed through an iterative process of interviews and workshops with staff from affected Town departments.

<b>Task ID</b>	<b>Task Description</b>	<b>Responsible</b>	<b>Schedule Notes</b>
PPOM-1	Develop municipal storm system inspection worksheet and maintenance process consistent with new Stormwater Manual maintenance standards.	Public Works O&M	Worksheet to be finalized by 2/16/2010.
PPOM-2	Refine data management systems to track maintenance activities and inspections.	Public Works O&M	Tracking systems in place by 2/16/2010.
PPOM-3	Begin creating Stormwater Pollution Prevention Plans, incorporate into the Town's Stormwater Comprehensive Plan update.	Public Works O&M	To be completed by 10/30/2010.
PPOM-4	Develop and establish policies and procedures to reduce pollutants in stormwater discharges from lands owned or maintained by the Town.	Public Works O&M	To be completed by 10/30/2010.
PPOM-5	Establish annual inspection program for Town-owned flow control and runoff treatment facilities and perform identified maintenance within prescribed Permit timelines.	Public Works O&M	To be completed by 10/30/2010.
PPOM-6	Develop curricula and define staff training requirements for pollution prevention training program.	Public Works O&M	To be completed by 10/30/2010.
PPOM-7	Summarize annual activities for "Pollution Prevention and Operation and Maintenance" component of Annual Report; identify any updates to SWMP	Public Works O&M	The SWMP and Annual Report submittal is due on or before March 31st of

	document.		each year.
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8. MONITORING

This Section describes the Permit requirements related to water quality monitoring, including current and planned activities.

8.1 Permit Requirements

The Permit (Section S8) does not require municipalities to conduct water quality sampling or other testing during this Permit term, with the following exceptions:

- Water quality monitoring required for compliance with TMDLs [total maximum daily pollutant loads, a.k.a., water quality clean-up plans]. The Town's current Permit does not include TMDL requirements because there were no EPA-approved TMDLs affecting the Town prior to the cut-off date (February 2006) for inclusion in the current Permit.
- Any sampling or testing required for characterizing illicit discharges pursuant to the Permit's Illicit Discharge Detection and Elimination conditions.
- Preparation for future, comprehensive, long-term water quality monitoring efforts consistent with current Phase I monitoring requirements. According to the Permit, this program would include two components: 1) general stormwater quality monitoring and, 2) targeted Stormwater Management Program effectiveness monitoring. The stormwater monitoring is intended to characterize stormwater runoff quantity and quality at a limited number of locations. This characterization would allow for analysis of pollutants and changes in conditions over time and across the Town. The Stormwater Management Program effectiveness monitoring is intended to improve stormwater management efforts by evaluating various stormwater controls. Results of the monitoring will be used to support the adaptive management process for improving programs over time.
- Identification of two outfalls where permanent stormwater sampling stations can be installed and operated for future monitoring (by the end of the Permit term and with the 4<sup>th</sup> Annual Report). The two outfalls must represent commercial, high-density residential, and industrial land uses. The monitoring shall include plans for stormwater, sediment or receiving water monitoring of physical, chemical, and/or biological characteristics.
- Identification of two suitable SWMP Program questions and sites where targeted SWMP Program effectiveness monitoring can be conducted together with development of a monitoring plan for these questions and sites. The proposed effectiveness monitoring should be prepared to answer the following types of questions:
  - How effective is a specific targeted action or a narrow suite of actions?
  - Is the Stormwater Management Program achieving a targeted environmental outcome?

In addition, the Town is required to provide the following monitoring and/or assessment data in Annual Reports:

- A description of stormwater monitoring or studies conducted by the Town during the reporting period. If stormwater monitoring was conducted on behalf of the Town, or if studies or investigations conducted by other entities were reported to the Town, a brief description of the type of information gathered or received shall be included in the Annual Report.
- An assessment of the appropriateness of the best management practices identified by the Town for components of the Stormwater Management Program; and changes made, or anticipated to be made, to the practices that were previously selected to implement the Stormwater Management Program and why those changes are desirable.

## 8.2 Planned Activities

Steilacoom will likely need to create a Water Quality Monitoring Program to maintain compliance during the next Permit term. Except for summarizing monitoring activities no actions are required until 2010. Table 8-1 presents the work plan for 2010 SWMP monitoring activities. These tasks were developed through an iterative process of interviews and workshops with staff from affected Town departments.

<b>Table 8-1. 2010 Water Quality Monitoring Work Plan</b>			
<b>Task ID</b>	<b>Task Description</b>	<b>Lead</b>	<b>Schedule Notes</b>
MNTR-1	Identify two outfalls for permanent sampling stations and develop a monitoring strategy for the current and future Permit water quality monitoring conditions.	Public Works	Continue through 2010.
MNTR-2	Summarize annual monitoring activities for the Annual Report; identify any updates to the SWMP document.	Public Works	The SWMP and Annual Report submittal is due on or before March 31st of each year.

## APPENDIX A

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### Acronyms and Definitions

The following definitions and acronyms are taken directly from the Phase II Permit and are reproduced here for the reader's convenience.

**AKART** means all known, available, and reasonable methods of prevention, control and treatment. **All known, available and reasonable methods of prevention, control and treatment** refers to the State Water Pollution Control Act, Chapter 90.48.010 and 90.48.520 RCW.

**Basin Plan** is a surface water management process consisting of three parts: a scientific study of the basin's drainage features and their quality; developing actions and recommendations for resolving any deficiencies discovered during the study; and implementing the recommendations, followed by monitoring.

**Best Management Practices** ("BMPs") are the schedules of activities, prohibitions of practices, maintenance procedures, and structural and/or managerial practices approved by the Department that, when used singly or in combination, prevent or reduce the release of pollutants and other adverse impacts to waters of Washington State.

**BMP** means Best Management Practice.

**Component** or **Program Component** means an element of the Stormwater Management Program listed in S5 Stormwater Management Program for Cities, Towns, and Counties or S6 Stormwater Management Program for Secondary Permittees of this permit.

**CWA** means Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972) Pub.L. 92-500, as amended Pub. L. 95-217, Pub. L. 95-576, Pub. L. (6-483 and Pub. L. 97-117, 33 U.S.C. 1251 et.seq.

**Discharge** for the purpose of this permit means, unless indicated otherwise, any discharge from a MS4 owned or operated by the permittee.

**Ecology's Western Washington Phase I Municipal Stormwater Permit** regulates discharges from municipal separate storm sewers owned or operated by Clark, King, Pierce and Snohomish Counties, and the cities of Seattle and Tacoma.

**Ecology's Western Washington Phase II Municipal Stormwater Permit** covers certain "small" municipal separate stormwater sewer systems.

**Entity** means another governmental body, or public or private organization, such as another permittee, a conservation district, or volunteer organization.

**Equivalent document** means a technical stormwater management manual developed by a state agency, local government or other entity that includes the Minimum Technical Requirements in Appendix 1 of this Permit. The Department may conditionally approve manuals that do not include the Minimum Technical Requirements in Appendix 1; in general, the Best Management Practices (BMPs) included in those documents may be applied at new development and redevelopment sites, but the Minimum Technical Requirements in Appendix 1 must still be met.

**Heavy equipment maintenance or storage yard** means an uncovered area where any heavy equipment, such as mowing equipment, excavators, dump trucks, backhoes, or bulldozers are washed or maintained, or where at least five pieces of heavy equipment are stored.

**Illicit connection** means any man-made conveyance that is connected to a municipal separate storm sewer without a permit, excluding roof drains and other similar type connections. Examples include sanitary sewer connections, floor drains, channels, pipelines, conduits, inlets, or outlets that are connected directly to the municipal separate storm sewer system.

**Illicit discharge** means any discharge to a municipal separate storm sewer that is not composed entirely of storm water except discharges pursuant to a NPDES permit (other than the NPDES permit for discharges from the municipal separate storm sewer) and discharges resulting from fire fighting activities.

**IDDE-** Illicit discharge detection and elimination

**Low Impact Development (LID)** means a stormwater management and land development strategy applied at the parcel and subdivision scale that emphasizes conservation and use of on-site natural features integrated with engineered, small-scale hydrologic controls to more closely mimic pre-development hydrologic functions.

**Major Municipal Separate Storm Sewer Outfall** means a municipal separate storm sewer outfall from a single pipe with an inside diameter of 36 inches or more, or its equivalent (discharge from a single conveyance other than circular pipe which is associated with a drainage area of more than 50 acres); or for municipal separate storm sewers that receive stormwater from lands zoned for industrial activity (based on comprehensive zoning plans or the equivalent), an outfall that discharges from a single pipe with an inside diameter of 12 inches or more or from its equivalent (discharge from other than a circular pipe associated with a drainage area of 12 acres or more).

**Material Storage Facilities** means an uncovered area where bulk materials (liquid, solid, granular, etc.) are stored in piles, barrels, tanks, bins, crates, or other means.

**Maximum Extent Practicable (MEP)** refers to paragraph 402(p)(3)(B)(iii) of the federal Clean Water Act which reads as follows: Permits for discharges from municipal storm sewers shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques, and system, design, and engineering methods, and other such provisions as the Administrator or the State determines appropriate for the control of such pollutants.

**MEP** means Maximum Extent Practicable.

**MTRs** means Minimum Technical Requirements.

**Municipal Separate Storm Sewer System (MS4)** means a conveyance, or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains):

(i) owned or operated by a state, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State Law) having jurisdiction over

disposal of wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the United States.

(ii) designed or used for collecting or conveying stormwater.

(iii) which is not a combined sewer; and (iv) which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.

**National Pollutant Discharge Elimination System (NPDES)** means the national program for issuing, modifying, revoking, and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under sections 307, 402, 318, and 405 of the Federal Clean Water Act, for the discharge of pollutants to surface waters of the state from point sources. These permits are referred to as NPDES permits and, in Washington State, are administered by the Washington Department of Ecology.

**Notice of Intent (NOI)** means the application for, or a request for coverage under this General Permit pursuant to WAC 173-226-200.

**Outfall** means point source as defined by 40 CFR 122.2 at the point where a municipal separate storm sewer discharges to waters of the State and does not include open conveyances connecting two municipal separate storm sewer systems, or pipes, tunnels, or other conveyances which connect segments of the same stream or other waters of the State and are used to convey waters of the State.

**O&M-** Operations and Maintenance

**Permittee** unless otherwise noted, the term "Permittee" includes Permittee, Co-Permittee, and Secondary Permittee, as defined below:

- (i) A “Permittee” is a city, town, or county owning or operating a regulated small MS4 applying and receiving a permit as a single entity.
- (ii) A “Co-Permittee” is any operator of a regulated small MS4 that is applying jointly with another applicant for coverage under this Permit. Co-Permittees own or operate a regulated small MS4 located within or adjacent to another regulated small MS4.
- (iii) A “Secondary Permittee” is an operator of regulated small MS4 that is not a city, town or county.

**Small Municipal Separate Storm Sewer System or Small MS4** is a conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels and/or storm drains which is:

a. Owned or operated by a city, town, county, district, association or other public body created pursuant to State law having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under State law such as a sewer districts, flood control districts or drainage districts, or similar entity.

b. Designed or used for collecting or conveying stormwater.

c. Not a combined sewer system,

d. Not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.

e. Not defined as “large” or “medium” pursuant to 40 CFR 122.26(b)(4) & (7) or designated under 40 CFR 122.26 (a)(1)(v).

Small MS4s include systems similar to separate storm sewer systems in municipalities such as: universities, large publicly owned hospitals, prison complexes, highways and other thoroughfares. Storm sewer systems in very discrete areas such as individual buildings do not require coverage under this Permit.

Small MS4s do *not* include storm drain systems operated by non-governmental entities such as: individual buildings, private schools, private colleges, private universities, and industrial and commercial entities.

**Stormwater** means runoff during and following precipitation and snowmelt events, including surface runoff and drainage.

**Stormwater Associated with Industrial and Construction Activity** means the discharge from any conveyance which is used for collecting and conveying stormwater, which is directly related to manufacturing, processing or raw materials storage areas at an industrial plant, or associated with clearing grading and/or excavation, and is required to have an NPDES permit in accordance with 40 CFR 122.26.

**Stormwater Management Manual for Western Washington** means the 5-volume technical manual (Publication Nos. 99-11 through 15 for the 2001 version and Publication Nos. 05-10-029-033 for the 2005 version (The 2005 version replaces the 2001 version) prepared by Ecology

for use by local governments that contains BMPs to prevent, control, or treat pollution in storm water.

**Stormwater Management Program (SWMP)** means a set of actions and activities designed to reduce the discharge of pollutants from the regulated small MS4 to the maximum extent practicable and to protect water quality, and comprising the components listed in S5 or S6 of this Permit and any additional actions necessary to meet the requirements of applicable

**Vehicle Maintenance or Storage Facility** means an uncovered area where any vehicles are regularly washed or maintained, or where at least 10 vehicles are stored.