

**DRAFT 2020
STORMWATER MANAGEMENT PROGRAM
PLAN**

CITY OF RENTON MUNICIPAL STORMWATER PROGRAM



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City of Renton
1055 South Grady Way
Renton, Washington 98057

February 14, 2020

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INTRODUCTION AND BACKGROUND

In 1987, Congress amended the federal Clean Water Act to address municipal stormwater discharges through the National Pollution Discharge Elimination System (NPDES) permits. In Washington State, the Washington State Department of Ecology (Ecology) is responsible for issuing and renewing these permits. In 2007, NPDES Municipal Stormwater permits were issued in Washington for two groups of permittees: Phase I jurisdictions and Phase II jurisdictions. Phase I permits were issued to large municipalities and county governments with populations over 100,000 (as of the 1990 census). Phase II Permits were issued to smaller governmental entities generally with populations between 10,000 and 100,000. The City of Renton (city) is covered under Western Washington's Phase II Municipal Separate Stormwater Sewer System (MS4) NPDES permit (Phase II Permit).

Discharges from MS4s (systems designed to collect and convey stormwater runoff) are regulated by Ecology under the NPDES program. The municipal NPDES permit seeks to control or reduce pollutant discharge to the maximum extent practicable, primarily through programmatic efforts. The city is regulated by Ecology as a Phase II permittee. The first Phase II Permit became effective on February 16, 2007, was modified in 2009, and expired on February 15, 2012. Ecology extended the 2007-2012 Phase II Permit requirements until July 2013. The second Phase II Permit was issued on August 1, 2012 and became effective on August 1, 2013. Ecology extended the 2013-2018 Phase II Permit requirements until July 2019. The third Phase II Permit was issued on July 1, 2019 and became effective on August 1, 2019. For fiscal year 2020 (July 1, 2019 through June 30, 2020), the city was charged an annual permit fee of \$65,157 by Ecology. This annual fee will likely increase with future Phase II Permit updates.

The Phase II Permit requires the city to develop a Stormwater Management Program (SWMP). The SWMP must include the following components:

1. A stormwater planning program to inform and assist in the development of policies and strategies as water quality management tools to protect receiving waters
2. An education and outreach program designed to build general awareness about methods to address stormwater impacts, affect behavior change to reduce behaviors that lead to adverse stormwater impacts, and create stewardship opportunities that encourage the community to address stormwater impacts
3. A public involvement and participation program to provide opportunities for the public to get involved in the development, implementation, and update of the SWMP and SMAP
4. An ongoing program to map and document the MS4

5. An ongoing illicit discharge detection and elimination (IDDE) program to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4
6. A program to reduce pollutants in stormwater runoff to the MS4 from new development, redevelopment, and construction site activities
7. An operation and maintenance (O&M) program to regulate and conduct maintenance activities to prevent or reduce pollutant runoff
8. A program to prevent and reduce pollutant runoff from areas that discharge to the MS4

In addition, the Phase II Permit requires that the city prepare written documentation of the SWMP and update that documentation annually. This SWMP plan satisfies this requirement. In addition to the eight components listed above, this SWMP plan includes a discussion of the total maximum daily load, monitoring, and reporting requirements of the Phase II Permit. This SWMP plan also includes a description of the city's external and internal coordination mechanisms as required by S5.A.5.a and S5.A.5.b, respectively in Appendix A.

COMPREHENSIVE STORMWATER PLANNING

The city plans to implement the comprehensive stormwater planning requirements over the permit term. This section describes the Phase II Permit requirements related to comprehensive stormwater planning, including planned activities.

2019–2024 Phase II Permit Requirements

Section S5.C.1 of the 2019-2024 Phase II Permit requires the city to implement a stormwater planning program to develop policies and strategies as water quality management tools to protect receiving waters. The specific Phase II Permit requirements are as follows:

1. Convene an interdisciplinary team to inform in the development, progress, and influence of the program by **August 1, 2020**.
2. Report on how stormwater management needs and receiving water protection/improvement inform the long-range planning update process and influence policies and implementation strategies. By **March 31, 2021** respond to a series of questions in the annual report and by **January 1, 2023**, submit a report describing how water quality is addressed in long-range land use plans.
3. Annually assess and report newly identified administrative or regulatory barriers to implementation of low impact development (LID) principles or low impact development best management practices (LID BMPs) since local codes were adopted in 2016. Describe mechanisms to encourage or require LID implementation.
4. Implement stormwater management action planning:
 - a. Document and assess existing information related to local receiving water bodies and contributing area conditions. By **March 31, 2022**, submit a watershed inventory and assessment.
 - b. By **June 30, 2022**, develop a prioritization method and process to identify which receiving waters will most benefit from stormwater facility retrofits, tailored implementation of SWMP action and other land/development management actions. Document the prioritized and ranked list of receiving waters.
 - c. By **March 31, 2023**, develop a Stormwater Management Action Plan (SMAP) for at least one high priority area.

Planned and Recommended Activities

Table 1-1 summarizes the city's planned activities associated with Comprehensive Stormwater Planning.

Table 1-1. Planned Comprehensive Stormwater Planning Activities.			
Activity	Tasks	Lead	Proposed Schedule or Frequency
Interdisciplinary team	Convene an interdisciplinary team to develop and influence the program.	Surface Water Utility (SWU) Engineering	August 1, 2020
Long-range plan update for 2013-2019 permit	Respond to a series of stormwater planning annual report questions to describe how stormwater impacts on water quality were addressed in the Comprehensive Plan during the 2013-2019 permit term.	Community and Economic Development (CED) Long Range Planning, SWU Engineering, Transportation Planning, Parks Planning	March 31, 2021
Long-range plan update for 2019-2024 permit	Respond to questions and submit a report describing how water quality is being addressed in the Comprehensive Plan during the 2019-2024 permit term.	CED Long Range Planning, SWU Engineering, Transportation Planning, Parks Planning	January 1, 2023
LID implementation	Require LID principles and BMPs in codes, rules and standards. Annually assess and document barriers and mechanisms to encourage or require LID implementation.	CED Long Range Planning, CED Planning, SWU Engineering	December 31, 2020
Receiving water basin assessment	Document local receiving waters and contributing area conditions data and submit a watershed inventory.	SWU Engineering, Surface Water (SW) Maintenance	March 31, 2022
Receiving water basin prioritization	Develop a prioritization method and document a prioritized list of receiving waters.	SWU Engineering, SW Maintenance	June 30, 2022
Stormwater Management Action Plan	Develop a Stormwater Management Action Plan (SMAP).	SWU Engineering, SW Maintenance	March 31, 2023

PUBLIC EDUCATION AND OUTREACH

The city's public education and outreach program currently includes a wide range of educational brochures for a variety of audiences. The city has partnered with the Environmental Coalition of South Seattle (ECOSS) to provide stormwater spill kits and spill response education training to small businesses since 2014. The city also has a drain marker volunteer program. This section describes the Phase II Permit requirements related to Public Education and Outreach, including the city's planned compliance activities.

2019–2024 Phase II Permit Requirements

Section S5.C.2 of the 2019-2024 Phase II Permit requires the city to implement an education and outreach program based on water quality information and target audience characteristics. Education and outreach efforts shall be prioritized in the following areas:

1. Build general awareness that annually selects at least one target audience and one subject area from a or b:
 - a. General public (including overburdened communities or school age children), or businesses (including home-based or mobile businesses)

Subject areas:

- General impacts of stormwater on surface waters, including impacts from impervious surfaces
- Low impact development (LID) principles and LID BMPs

- b. Engineers, contractors, developers, or land-use planners

Subject areas:

- Technical standards for stormwater site and erosion control plans
- LID principles and BMPs
- Stormwater treatment and flow control BMPs/facilities

2. Affect behavior change that selects at least one target audience and one BMP from the following:

- a. Residents, landscapers, property managers/owners, developers, school age children, or businesses (including home-based or mobile businesses)

BMPs:

- Use and storage of pesticides, fertilizers, and/or other household chemicals
- Use and storage of automotive chemicals, hazardous cleaning supplies, carwash soaps, and/or other hazardous materials

- Prevention of illicit discharges
 - Yard care techniques protective of water quality
 - Carpet cleaning
 - Repair and maintenance BMPs for vehicles, equipment, and/or home buildings
 - Pet waste management and disposal
 - LID principles and LID BMPs
 - Stormwater facility maintenance, including LID facilities
 - Dumpster and trash compactor maintenance
 - Litter and debris prevention
 - Sediment and erosion control
 - (Audience specific) Source control BMPs
 - (Audience specific) Locally-important, municipal stormwater-related subject area
- b. By **July 1, 2020**, conduct a new evaluation of the effectiveness of an ongoing behavior change campaign with lessons learned and recommendations to inform a social marketing campaign.
- c. Based on the recommendations, by **February 1, 2021**, use social marketing methods to develop a campaign tailored to the community, including an evaluation plan, strategy and schedule.
- d. By **April 1, 2021**, begin to implement the developed strategy.
- e. By **March 31, 2024**, evaluate and report on changes in understanding and adopted behaviors resulting from the implemented strategy and on planned or recommended changes to the program to improve efficacy.
- f. Use the evaluation results to continue to direct effective methods and implementation of the ongoing behavior change program.
3. Provide and advertise stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities or events such as storm drain marking, volunteer monitoring, riparian plantings and education activities.

Planned and Recommended Activities

Table 2-1 summarizes the city's planned activities associated with Public Education and Outreach. Table 2-2 summarizes recommended public education program elements that the city may initiate depending on available staffing and funding.

Table 2-1. Planned Public Education and Outreach Activities.

Activity	Tasks	Lead	Proposed Schedule or Frequency
Solid waste events and social media outreach	Provide education on natural yard care, hazardous waste management, waste prevention and pet waste disposal.	Solid Waste (SW) Section	Ongoing
Recycling events	Coordinate two collection events for household hazardous wastes such as oil, antifreeze, oil filters, and batteries.	SW Section	May and September 2020
Multifamily outreach	Provide educational solid waste resources to multifamily residences.	SW Section	Ongoing
Partner with Local Hazardous Waste Management Program	Partner with local jurisdictions to provide outreach for proper handling and storage of hazardous materials and opportunities for their disposal.	SW Section	Ongoing
In House Battery Collection	Provide collection of batteries for residents at city facilities.	SW Section	Ongoing
Aquifer Model	Provide water quality and conservation education at public events.	Water Utility Engineering	Ongoing
Natural Yard Care Funding	Fund Saving Water Partnership (SWP) to conduct natural yard care classes.	Water Utility Engineering	Ongoing
Nature Vision Classroom Programs	Provide funding through SWP to conduct watershed science classes at elementary schools.	Water Utility Engineering	Ongoing
Business education and outreach ^a	Partner with ECOSS to provide spill kits and spill response education/training to restaurants.	Surface Water Utility (SWU) Engineering	December 31, 2020
Participate in STORM (<i>STormwater Outreach for Regional Municipalities</i>)	Participate in STORM program and promote the Puget Sound Starts Here campaign messaging.	SWU Engineering	Ongoing
Volunteer Storm Drain Marker Program	Coordinate citizen volunteers to mark stormwater drains.	SWU Engineering	Ongoing
WRIA 8 and WRIA 9	Partner with WRIA 8 Salmon Recovery Council and WRIA 9 Watershed Ecosystem Forum.	SWU Engineering	Ongoing
Community stewardship events	Coordinate community events to plant trees at city parks.	Parks Planning & Natural Res.	April 25, 2020 Fall 2020
Volunteer riparian tree planting	Coordinate volunteer events to plant trees in riparian areas.	Parks & Trails	March 7, 2020

^a This activity also can be used to meet S5.C.5.b - informing public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.

Table 2-2. Recommended Public Education and Outreach Activities.			
Activity	Tasks	Lead	Proposed Schedule or Frequency
Expand educational materials available through existing programs and streamline stormwater outreach messaging and public handouts	<p>Integrate stormwater education and outreach into existing Public Works programs.</p> <p>Develop consistent stormwater outreach messaging among various city departments.</p> <p>Combine handouts based on target audiences and eliminate handouts with redundant information.</p>	SWU Engineering	TBD
Car wash outreach	Provide outreach to groups holding charity car wash events.	SWU Engineering	TBD
King Conservation District Classroom Programs	Partner with KCD to provide stormwater classes in elementary schools.	SWU Engineering	TBD
EcoFilm Series	Show films that encourage stewardship	SW Section	TBD
Aquifer Protection Program	Provide education on proper chemical storage to businesses in aquifer protection zones.	Water Utility Engineering	TBD
Natural Yard Care Program	Provide classes teaching yard care methods to eliminate use of pesticides, herbicides and chemical fertilizers.	SWU Engineering	TBD
Promote community stewardship	Encourage community involvement with stream teams, volunteer monitoring, riparian planting or education activities.	SWU Engineering	TBD
Expand Adopt a Neighborhood Program	Evaluate the addition of a stormwater BMP component to the city's Adopt a Neighborhood Program.	SWU Engineering	TBD
Develop and circulate new public education materials ^a	Develop an illicit discharge handout, mailing handouts to single-family residences, and provide relevant handouts at pre-application meetings.	SWU Engineering	TBD
Street Tree Replacement	Fill planting spots and replace trees. Distribute tree care information.	Parks Planning & Natural Res.	TBD
Illicit discharge education and outreach ^a	Develop a handout to provide to companies that respond to spills associated with automobile accidents.	Interdepartmental Team	TBD

TBD = to be determined, activities depend on funding and staffing.

^a This planned activity also can be used to meet S5.C.5.b - informing public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.

PUBLIC INVOLVEMENT AND PARTICIPATION

Public input is important to the development and implementation of city plans. The city actively solicits public participation by making stormwater information available for review and providing opportunities for comment. This section describes the Phase II Permit requirements related to public involvement, including planned compliance activities.

2019-2024 Phase II Permit Requirements

Section S5.C.3 of the 2019-2024 Phase II Permit require that the city create opportunities for the public to participate in the decision-making processes involving the development, implementation, and update of the SWMP and SMAP, and comply with applicable state and local public notice requirements. The two main components include:

1. Providing opportunities for the public, including overburdened communities, to participate in the decision-making process of the development, implementation, and update of the city SMAP and SWMP.
2. Posting the Annual Report and the SWMP Plan, on the city's website no later than May 31 of each year.

Planned Activities

Table 3-1 summarizes the city's planned activities associated with public involvement and participation.

Table 3-1. Planned Public Involvement and Participation Opportunities.			
Activity	Tasks	Lead	Proposed Schedule or Frequency
Revise SWMP Plan	Update SWMP Plan with planned activities for 2020.	SWU Engineering	Update SWMP Plan in first quarter of 2020; post on city's website by May 31, 2020
Prepare and submit Annual Report to Ecology	Prepare and submit Annual Report including SWMP Plan and other supplemental documentation (as applicable).	SWU Engineering	March 31, 2020
Public involvement in the SWMP and SMAP	Solicit feedback on website and on social media.	SWU Engineering	Ongoing

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MS4 MAPPING AND DOCUMENTATION

The city maintains a current electronic map of the MS4 in CORMaps:

<http://rp.rentonwa.gov/Html5Public/Index.html?viewer=CORMaps>. This section describes the MS4 Mapping and Documentation Phase II Permit requirements, as well as the city's planned compliance activities for the 2019-2024 Phase II Permit cycle.

2019–2024 Phase II Permit Requirements

Section S5.C.4 of the 2019-2024 Phase II Permit requires the city include an ongoing program for mapping and documenting the MS4. The specific Phase II Permit requirements are as follows:

1. Maintain mapping data for these features:
 - a. Known MS4 outfalls and known MS4 discharge points
 - b. Receiving waters, other than groundwater
 - c. Stormwater treatment and flow control BMPs/facilities owned or operated by the city
 - d. Geographic areas served by the MS4 that do not discharge stormwater to surface waters
 - e. Tributary conveyances and associated features to known outfalls and discharge points with a 24" diameter or equivalent cross-sectional area
 - f. Connections between the city's MS4 and other municipalities or public entities
 - g. All connections to the MS4 authorized or allowed by the city after February 16, 2007
2. Record mapping data for these features:
 - a. By **January 1, 2020**, collect size and material for all known MS4 outfalls during the normal course of business
 - b. By **August 1, 2023**, all known connections from the MS4 to privately owned stormwater systems
3. By **August 1, 2021**, record map electronically with fully described mapping standards.
4. Make maps available upon request to Ecology, federally recognized Tribes, municipalities, and other Permittees.

Planned Activities

Table 4-1 summarizes the planned activities associated with the city's MS4 mapping and documentation program.

Table 4-1. Planned MS4 Mapping and Documentation Activities.			
Activity	Tasks	Lead	Proposed Schedule or Frequency
Maintain mapping data	Maintain map of existing required MS4 features	SWU Engineering	Ongoing
Map outfall features	Map, size and material at known outfalls during the normal course of business	SWU Engineering	January 1, 2020
Map connections	Map known connections from the MS4 to private stormwater systems	SWU Engineering	August 1, 2023
Electronic map	Maintain an electronic map and standards	SWU Engineering	August 1, 2021
Map access	Provide mapping information to public entities upon request	SWU Engineering	Ongoing

ILLICIT DISCHARGE DETECTION AND ELIMINATION

An illicit discharge is defined as any discharge into the stormwater system that is not composed entirely of stormwater, or of non-stormwater discharges allowed as specified in the Phase II Permit. Illicit discharges may be from a variety of sources and activities including illegal dumping, sanitary sewer overflow, swimming pool cleaning, and incidental spills (such as oil, gas, diesel fuel, paints, or solvents). This section describes the Illicit Discharge Detection and Elimination (IDDE) Phase II Permit requirements, as well as the city's planned compliance activities.

2019–2024 Phase II Permit Requirements

Section S5.C.5 of the 2019-2024 Phase II Permit requires the city to include an ongoing IDDE Program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the stormwater system. The specific Phase II Permit requirements are as follows:

1. Implement a program with procedures to report and address illicit discharges including spills, and illicit connections, and procedures to address pollutants from an interconnected, adjoining MS4.
2. Inform public employees, businesses, and the general public of the hazards associated with illicit discharges and improper disposal of waste.
3. Implement an ordinance that effectively prohibits non-stormwater, illicit discharges into the MS4. Evaluate and update existing ordinances, as needed.
4. Implement and document a field screening method for illicit discharges and connections, complete screening an average of 12 percent of the stormwater system per year, and track the total percentage of the MS4 screened between **August 1, 2019** and **December 31, 2023**.
5. Publicize a public hotline number for reporting of spills and other illicit discharges; and track all calls and follow-up actions taken.
6. Implement an ongoing training program for municipal field staff on identification and reporting procedures.
7. Implement an ongoing program designed to address illicit discharges, including spills and illicit connections, which includes procedures for characterizing the nature and potential threats of an illicit discharge, procedures for tracing the source of an illicit discharge, and procedures for eliminating the discharge within specific timeframes.
8. Implement an ongoing training program for staff responsible for identification, investigation, termination, cleanup and reporting.
9. Track and maintain records of IDDE activities following the Permit-specified format.

Planned Activities

Table 5-1 summarizes the planned activities associated with the city's IDDE program.

Activity	Tasks	Lead	Proposed Schedule or Frequency
Coordination with adjoining MS4s	Develop and implement procedures to address pollutants from adjoining MS4s.	SWU Engineering, SW Maintenance	Ongoing
Illicit Discharge Program Plan implementation	Implement Illicit Discharge Program plan requirements to report and address illicit discharges and illicit connections. Implement procedures in the Spill Response Standard Operating Procedures Manual.	SWU Engineering, CED Development Engineering, CED Construction Inspectors, CED Building Inspectors, CED Code Compliance, Parks & Trails, Golf Course, Airport, Public Works Maintenance	Ongoing
Business education and outreach	Partner with ECOSS to provide spill kits and spill response education/training for businesses.	SWU Engineering	December 31, 2020
Illicit discharge ordinance	Evaluate existing ordinance effectiveness in prohibiting illicit discharges.	SWU Engineering, SW Maintenance, CED Code Compliance	Ongoing
Illicit discharge and illicit connection field screening	Implement a field screening methodology (or methodologies) to meet the field screening requirement.	SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	Field screen 12% of the storm system on average by December 31, 2020. Track total percentage since August 1, 2019.
Spill hotline	Publicize the spill hotline	SWU Engineering	Ongoing
Staff training	Training on IDDE general awareness and IDDE response.	Interdepartmental Team	Ongoing
Staff training	Training on IDDE investigation, termination, cleanup and reporting.	SWU Engineering, SW Maintenance	Ongoing
Record keeping	Utilize Cityworks or Excel to record IDDE activities per Permit-specified format.	SWU Engineering, SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	Ongoing

CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT, AND CONSTRUCTION SITES

The CED Development Services and Planning Divisions are responsible for permitting, inspection, and code enforcement actions for private construction-related activities in the city. City project managers are responsible for stormwater review of public capital projects. This section describes the Phase II Permit requirements related to controlling runoff from new development, redevelopment, and construction sites, including planned activities.

2019–2024 Phase II Permit Requirements

Section S5.C.6 of the 2019-2024 Phase II Permit requires that the city implement and enforce a program to reduce pollutants in stormwater runoff to the MS4 from new development, redevelopment, and construction activities. The specific Phase II Permit requirements are as follows:

1. Implement an ordinance that addresses runoff from new development, redevelopment, and construction sites and adopt minimum requirements, thresholds and definitions in Appendix 1 of the Phase II Permit or approved program and amendments by **June 30, 2022**.
2. Review all stormwater site plans for proposed development activities.
3. Conduct inspections of construction sites prior to clearing and construction, during construction, and upon completion of construction.
4. Conduct inspections of all stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every six months until 90% of the lots are constructed.
5. Provide a link to state stormwater general permit NOI forms for construction and industrial sites.
6. Conduct ongoing training for staff responsible for implementing the program to control stormwater runoff from new development, redevelopment, and construction sites.

Planned Activities

Table 6-1 summarizes the city's planned activities associated with controlling runoff from new development, redevelopment, and construction sites.

Activity	Tasks	Lead	Proposed Schedule or Frequency
Staff training	Pursue training opportunities for plan review and inspection staff.	CED Planning	Ongoing
Stormwater site plan review	Review all stormwater site plans for proposed development activities in accordance with the City of Renton Surface Water Design Manual.	CED Development Engineering (private) and Capital Improvement Program (CIP) Lead (public)	Ongoing
Preconstruction inspections	Inspect construction sites prior to construction if they exhibit high sediment transportation potential.	CED Development Engineering and CED Planning	Ongoing
Construction inspections	Inspect all sites during construction to verify proper installation and maintenance of required erosion and sediment controls.	CED Construction Inspectors and CED Building Inspectors	Ongoing
Residential construction inspections	Inspect stormwater facilities and catch basins every six months until 90% of lots are constructed.	SWU Engineering	Ongoing
Post-construction inspections	Inspect all sites after construction to ensure proper installation of permanent stormwater facilities, verify that maintenance plan is complete and maintenance responsibility assigned.	CED Construction Inspectors and CED Building Inspectors	Ongoing
Development site enforcement	Implement enforcement strategy for sites that are not in compliance	CED Construction Inspectors, CED Building Inspectors, Code Compliance	Ongoing
Review and adopt program amendments	Review and adopt amendment requirements into the city's Surface Water Design Manual and applicable codes.	CED Development Engineering, CED Planning and SWU Engineering	Before June 30, 2022
Notice of Intent availability	Provide link to the Construction and Industrial Permits' NOI forms	CED Development Engineering	Ongoing

OPERATIONS AND MAINTENANCE

City staff from Public Works and Community Services are responsible for operations and maintenance of MS4 infrastructure. This section describes the Phase II Permit requirements related to operations and maintenance, including planned activities.

2019–2024 Phase II Permit Requirements

Section S5.C.7 of the 2019-2024 Phase II Permit requires the city to implement and document an O&M program to regulate and conduct maintenance activities to prevent or reduce stormwater impacts. The specific Phase II Permit requirements are as follows:

1. Implement maintenance standards that are at least as protective as those specified in Ecology's *Stormwater Management Manual for Western Washington* or approved program. No later than **June 30, 2022**, update maintenance standards as needed.
2. Implement provisions to verify adequate long-term operation and maintenance (O&M) of stormwater treatment and flow control BMPs/facilities.
3. Conduct annual inspections of all stormwater treatment and flow control BMPs/facilities that discharge to the stormwater system and were permitted by the City since 2010 (unless maintenance records justify a reduced inspection frequency).
4. Perform annual inspections of all city-owned or operated permanent stormwater treatment and flow control BMPs/facilities, other than catch basins, and take appropriate maintenance actions (unless maintenance records justify a reduced inspection frequency).
5. Spot check potentially damaged permanent treatment and flow control BMPs/facilities (other than catch basins) after major storm events; and conduct maintenance and repairs as needed.
6. Perform routine catch basin and inlet inspections. Clean as needed based on maintenance standards. Elect to use an alternative approach to inspection if desired.
7. Implement and document practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the city and road maintenance activities under the functional control of the city.
8. Implement an ongoing training program for city staff whose primary construction, operations, or maintenance job functions may impact stormwater quality.
9. Implement Stormwater Pollution Prevention Plans (SWPPPs) for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the city.
10. Maintain records of inspections, maintenance, repair, and enforcement activities.

Planned Activities

Table 7-1 summarizes the city's planned activities associated with municipal O&M.

Table 7-1. Planned Municipal Operations and Maintenance Activities.			
Activity	Tasks	Lead	Proposed Schedule or Frequency
Implement maintenance standards	Implement maintenance standards and perform maintenance per required schedule.	SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	Ongoing
Update maintenance standards	Review the latest Ecology <i>Stormwater Management Manual for Western Washington</i> and King County SWDM and determine which maintenance standards to adopt.	SWU Engineering, SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	Before June 30, 2022
Private stormwater facility inspections	Annually inspect private stormwater facilities constructed since February 2010. Identify maintenance needs and enforce maintenance standards.	SWU Engineering	December 31, 2020
Stormwater treatment and flow control facility/BMP inspections	Annually inspect city-owned or operated stormwater facilities. Identify maintenance needs and maintain facilities.	SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	December 31, 2020
Stormwater treatment and flow control facility/BMP spot checks	Conduct spot check inspections and as-needed maintenance for city-owned or operated stormwater facilities. Identify maintenance needs and maintain facilities.	SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	Ongoing
Catch basin inspection program	The Facilities Division and Airport Section implement standard approach.	Facilities, Airport	August 1, 2021
Catch basin inspection program	The Parks & Trails/Golf Course Divisions implement Option 2 (inspections on a "circuit basis").	Parks & Trails, Golf Course	August 1, 2021
Catch basin inspection program	The Surface Water Maintenance Division implements Option 3 (cleaning all pipes, ditches, catch basins, and inlets once during the permit term).	SW Maintenance	Before July 31, 2024
Maintenance practices, policies, and procedures	Implement O&M practices, policies and procedures.	SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	Ongoing

Table 7.1 Planned Municipal Operations and Maintenance Activities. (cont.)			
Document practices, policies, and procedures	Document O&M practices, policies and procedures	SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	December 31, 2022
Staff training	Pursue training opportunities for maintenance staff.	SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	Ongoing
Stormwater Pollution Prevention Plan (SWPPP)	Implement the SWPPP for the Maintenance Shops Facility.	Public Works Maintenance	Ongoing
Update SWPPP	Update SWMPP to include information per Permit specifications.	Public Works Maintenance	December 31, 2022
Record keeping	Utilize a Maintenance Management System (MMS) to record time and resources spent on all O&M activities, tracking of inspections, and maintenance performed.	SWU Engineering, SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	Ongoing

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SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

This section describes the Source Control Program for Existing Development Phase II Permit requirements, as well as the city's planned compliance activities.

2019–2024 Phase II Permit Requirements

Section S5.C.8 of the 2019-2024 Phase II Permit requires the city to implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4. The program includes applying operational and structural BMPs, and treatment BMPs if needed, to existing sources, inspecting BMP implementation at commercial and industrial properties, applying and enforcing local ordinances at sites, and implementing practices to reduce polluted runoff from pesticide, herbicide, and fertilizer applications. The specific Phase II Permit requirements are as follows:

1. By **August 1, 2022**, adopt an ordinance to require source control BMPs for pollutant generating sources associated with existing land uses and activities.
2. By **August 1, 2022**, establish an inventory of commercial, institutional, and industrial properties with pollutant generating potential.
3. By **January 1, 2023**, implement an inspection program for sites identified in the inventory.
 - a. Provide sites with information about pollutant generating activities.
 - b. Annually complete the number of inspections equal to 20% of the businesses and/or properties listed in the inventory and inspect all sites identified through complaints.
4. By **January 1, 2023**, implement a progressive enforcement policy that includes documented follow-up actions.
5. Conduct training for staff responsible for implementing the source control program.

Planned Activities

Table 8-1 summarizes the planned activities associated with the city's MS4 mapping and documentation program.

Table 8-1. Planned Source Control Activities.			
Activity	Tasks	Lead	Proposed Schedule or Frequency
Source control ordinance	Develop an ordinance to require source control BMPs for pollutant generating sources on existing development.	SWU Engineering	August 1, 2022
Inventory development	Identify pollutant generating businesses and/or properties.	SWU Engineering, SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	August 1, 2022
Educate businesses	Inform businesses on pollutant generating activities and applicable source control requirements.	SWU Engineering, SW Maintenance, Airport	January 1, 2023
Inspect businesses and/or properties	Annually inspect an equivalent number of 20% of businesses and/or properties and all complaints.	SWU Engineering, SW Maintenance	January 1, 2023
Enforce source control program	Implement documented follow-up actions and inspections.	SWU Engineering, SW Maintenance, CED Code Compliance	January 1, 2023
Staff training	Pursue training opportunities for source control program staff.	SWU Engineering, SW Maintenance, CED Code Compliance	Ongoing

TOTAL MAXIMUM DAILY LOAD REQUIREMENTS

This section provides a brief discussion of the Phase II Permit total maximum daily load (TMDL) requirements.

2019-2024 Phase II Permit Requirements

Section S7 of the NPDES Phase II Permit lists the following requirements:

1. Implement the specific requirements identified in Appendix 2 of the Phase II Permit for applicable TMDLs listed in Appendix 2.
2. Compliance with the permit constitutes compliance with applicable TMDLs not listed in Appendix 2 of the Phase II Permit.
3. Comply with permit modifications and TMDL implementation plans prepared by Ecology for TMDLs that are approved by the US Environmental Protection Agency (EPA) after the Phase II Permit has been issued.

Planned Activities

The city is not required to implement actions for compliance with total maximum daily loads (TMDLs) pursuant to Section S7 and Appendix 2 of the Phase II Permit, since the city is currently not affected by any TMDLs listed in Appendix 2 of the NPDES Phase II Permit.

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MONITORING

This section provides a brief discussion of the Phase II Permit monitoring requirements, including planned activities.

2019–2024 Phase II Permit Requirements

Section 58 of the 2019-2024 Phase II Permit requires the city to do the following:

1. For the previous permit cycle, pay into a collective fund to implement regional status and trends monitoring and effectiveness and source control identification studies by **December 1, 2019**.
2. For the current permit cycle, by **December 1, 2019**, notify Ecology of the city's intent to pay into a collective fund to implement the following programs:
 - Regional status and trends monitoring
 - Stormwater management program effectiveness and source identification studies or conduct stormwater discharge monitoring.
3. Submit records of SWMP activities tracked and/or maintained in response to requests by the Stormwater Action Monitoring Coordinator.

Planned Activities

The city plans to continue to opt to pay into the collective fund and start contributing to it beginning in August 2020. Annual payments into the collective fund, began in December 2019, include the following:

- Regional status and trends monitoring: \$16,987
- Stormwater management program effectiveness and source identification studies: \$31,045
- **Annual Total: \$48,032**
- **2019-2024 Phase II Permit Total: \$240,160**

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REPORTING

This section provides a brief discussion of Phase II Permit reporting requirements, including planned activities.

2019-2024 Phase II Permit Requirements

Section S9 of the 2019-2024 Phase II Permit list the following requirements:

1. Submit an annual report to Ecology no later than March 31 of each year (beginning in 2020).
2. Keep all records related to the NPDES Phase II Permit and the SWMP for at least 5 years.
3. Make records related to the NPDES Phase II Permit and the SWMP available to the public at reasonable times during business hours.

Planned Activities

The city plans to meet all of the reporting requirements outlined in the 2019-2024 Phase II Permit.

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APPENDIX A

Coordination Mechanisms

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External Coordination Mechanisms

The city coordinates with adjacent jurisdictions as needed to control pollutants between physically interconnected MS4s and coordinates stormwater management activities to avoid conflicting plans, policies and regulations.

The Surface Water Utility Section and Surface Water Maintenance Division implement procedures to coordinate with adjoining jurisdictions to address pollutants entering or leaving the city's MS4.

The Surface Water Utility Section coordinates stormwater management activities for shared watersheds through participation in the WRIA 8 Salmon Recovery Council, WRIA 9 Watershed Ecosystem Forum, and Our Green/Duwamish Watershed Stormwater Strategy.

Internal Coordination Mechanisms

The city formed a NPDES Interdepartmental Team in the fall of 2014 that includes staff from the following city Departments/Divisions:

- Public Works Department
 - Surface Water Utility (SWU) Engineering
 - Public Works Maintenance
 - Surface Water (SW) Maintenance
 - Renton Municipal Airport
 - Transportation Planning
 - Solid Waste Section
 - Water Utility Engineering
- Community and Economic Development (CED) Department
 - Development Engineering
 - Planning
 - Long Range Planning
 - Construction Inspections
 - Building Inspections
 - Code Compliance
- Community Services
 - Parks & Trails Division

- Golf Course Division
- Facilities Division
- Parks Planning & Natural Resources

The Interdepartmental Team developed a permit compliance matrix that lists Phase II Permit requirements, Ecology deliverables or documentation in the Annual Report, task leads, task support, and deadlines. The Interdepartmental Team will continue to coordinate Phase II Permit implementation activities during the duration of the permit, to ensure that the city meets the requirements of the Phase II Permit.

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