City of Orting

2023 NPDES Phase II Municipal Stormwater Permit

Annual Report

CITY OF ORTING
Public Works

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INTRODUCTION

Overview and Background

The Western Washington Phase II Municipal Stormwater Permit (Permit) is issued by the Washington State Department of Ecology (Ecology) under the National Pollutant Discharge Elimination System (NPDES). Permit Section S5 requires permittees to develop and implement a Stormwater Management Program (SWMP). Section S5 also requires permittees to prepare written documentation of the SWMP, which is referred to as the SWMP Plan (Plan)

This document is an update to the previous version of the City of Orting (City) 2019 SWMP Plan. This document reflects requirements from the Western Washington Phase II Municipal Stormwater Permit (Permit) for the August 1, 2019 through July 31, 2024 Permit term. The elements required for the SWMP Plan are based on Permit Section S5, which is included in Appendix A. SWMP Plan requirements include Items 1 through 8 of listed below. Items 9 through 11 are also included as they are items to be address as part of the SWMP.

1. Stormwater Planning
2. Public Education and Outreach
3. Public Involvement and participation
4. Municipal Separate Storm Sewer System (MS4) mapping and documentation
5. Illicit Discharge Detection and Elimination
6. Controlling Runoff from New Development, redevelopment, and Construction Sites
7. Operations and Maintenance
8. Source Control of Existing Development
9. Applicable Measures of the Permit Section S4 – Compliance with Standards
10. Applicable requirements of Permit Section S7 – Compliance with Total Maximum Daily Load (TMDL) Requirements
11. Applicable Requirements of Permit Section S8 – Monitoring and Assessment

The Permit requires the City to report annually (March 31 of each year) on progress in SWMP implementation for the prior year. The Permit also requires submittal of documentation that describes proposed SWMP activities for the coming year. Implementation of various conditions of the current permit are being phased throughout the 5-year Permit term from July 1, 2019 through July 31, 2024.

This report updates the City's 2019 SWMP Plan through January 31, 2021, to comply with Section 5 of the Permit. This 2020 SWMP Plan update describes actions the City is taking to maintain permit compliance.

Phased Implementation of Permit Requirements

The current Permit was issued July 1, 2019 and effective August 1, 2019. The current Permit will expire on July 31, 2024.

Ecology is phasing in many of the Permit requirements over the Permit term. A table summarizing the implementation dates is included in Appendix B. The SWMP Plan is required to be updated at least annually and submitted with the annual reports, which are due on March 31st of each year. The annual SWMP Plan update is to describe:

1. Planned activities for each of the SWMP Plan components;
2. Any additional planned actions required by Permit Section S7 – Compliance with Total Maximum Daily Load Requirements; and
3. Any additional planned actions required by Permit Section S8 – Monitoring and Assessment.

As required by the Permit, the City must:

1. Submit an annual report documenting Permit compliance activities for the previous calendar year on March 31st of each year, including the updated current SWMP Plan.
2. Keep all records related to the Permit and the SWMP Plan for at least 5 years in accordance with permit Section S9.B.
3. Make all records related to the Permit and the SWMP Plan available to the public in accordance with the provisions of Permit Section S9.C.

Additional Permit information is located on Ecology's website:
https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits/Western-Washington-Phase-II-Municipal-Stormwater

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 SWMP Plan is organized similarly to the Permit:

2. Stormwater Planning (S5.C.1)
3. Public Education and Outreach (S5.C.2)
4. Public Involvement and Participation (S5.C.3)
5. MS4 Mapping and Documentation (S5.C.4)
6. Illicit Discharge Detection and Elimination (S5.C.5)
7. Controlling Runoff from New Development, Redevelopment, and Construction Sites (S5.C.6)
8. Operations and Maintenance (S5.C.7)
9. Source Control Program for Existing Development (S5.C.8)
10. Compliance with Standards (S4)
11. Compliance with TMDL (S7)
12. Monitoring and Assessment (S8)

ORTING MUNICIPAL CODE 9-5A-1: FINDINGS OF FACT

A. Stormwater pollution is a problem associated with land utilization and development and the common occurrence of potential pollutants such as pesticides, fertilizers, petroleum products, pet wastes, and numerous others.

B. Land Utilization and development is also known to increase both the volume and duration of peak flows. The resulting erosion, scouring, and deposition of sediment affect the ecological balance in surface waters.

C. Sedimentation and stormwater pollution can cause diversity of species to decrease and allow more tolerant (and usually less desirable) species to remain.

D. Stormwater pollution can cause or contribute to closures or other restrictions on public use of the waters within the city.

E. An expanding population and increased development of land have led to:

1. Water quality degradation through discharge of nutrients, metals, oil and grease, toxic materials, and other detrimental substances including, without limitation, insect and weed control compounds;
2. Drainage and stormwater and surface water runoff problems within the city; and
3. Safety hazards to both lives and property posed by uncontrolled water runoff on streets and highways.

F. In the future, such problems and dangers will be reduced or avoided if existing properties and future development of private or public properties provide for stormwater quality treatment and flow control.

G. Stormwater quality treatment and flow control can be achieved when land is developed or redeveloped by implementing appropriate best management practices (BMPs).

H. BMPs can be expected to perform as intended only when properly designed, constructed and maintained.

I. Sites protected by levees may become temporary closed depressions because of backwater effects on stormwater drainage systems due to increases in river elevations.

J. The city is a permittee under the western Washington phase II municipal stormwater permit issued by the Washington state department of ecology under the federal clean water act and the state of Washington water pollution control law.

K. Not providing for stormwater management practices will lead to water quality degradation, erosion, property damage, endangerment of the health and safety of the inhabitants of the city, and/or violation of the provisions of the phase II municipal stormwater permit. (Ord. 911, 8-31-2011)

ORTING MUNICIPAL CODE: 9-5A-2: NEED:

A. Minimize water quality degradation.
B. Prevent erosion and sedimentation in creeks, streams, ponds, lakes and other water bodies.
C. Protect property owners on or adjacent to existing and developing lands from increased runoff rates which could cause erosion or flooding of abutting property.
D. Preserve and enhance the suitability of waters for contact recreation, fishing, and other beneficial uses.
E. Preserve and enhance the aesthetic quality of the water.
F. Promote sound development policies which respect and preserve city surface water and groundwater.
G. Ensure the safety of city roads and rights of way.
H. Protect the health, safety, and welfare of the inhabitants of the city. (Ord. 911, 8-31-2011)

ORTING MUNICIPAL CODE: 9-5A-3: PURPOSE:

The provisions of this article are intended to guide and advise all who conduct land disturbing activities, new development or redevelopment within the city. The provisions of this article establish the minimum level of compliance which must be met to permit a property to be developed or redeveloped within the city.

A. Minimize water quality degradation and sedimentation in streams, ponds, lakes, wetlands and other water bodies;
B. Minimize the impact of increased runoff, erosion and sedimentation caused by land development and maintenance practices;
C. Maintain and protect surface water and groundwater resources;
D. Minimize adverse impacts of alterations on ground and surface water quantities, locations and flow patterns;
E. Decrease potential landslide, flood and erosion damage to public and private property;
F. Promote site planning and construction practices that are consistent with natural topographical, vegetation and hydrological conditions;
G. Maintain and protect the city's stormwater management infrastructure and those downstream;
H. Provide a means of regulating clearing and grading of private and public land while minimizing water quality and flow impacts in order to protect public health and safety;
I. Provide minimum development regulations and construction procedures which will preserve, replace or enhance, to the maximum extent practicable, existing vegetation to preserve and enhance the natural qualities of lands, wetlands and water bodies. (Ord. 911, 8-31-2011)

KEY TERMS

AKART	all known, available and reasonable methods of treatment
Basin Plan	Mid-Puyallup Basin Plan
BMP	Best Management Practices
CAD	Computer Aided Design
CESCL	Certified Erosion Control and Sediment Control Lead
City	City of Orting
Ecology Manual	Stormwater Management Manual for Western Washington
Ecology	Washington State Department of Ecology
GIS	Geographical Information System
Group	Orting Stormwater Public Input Group
IDDE	Illicit Discharge Detection and Elimination
LID	Low-Impact Development
MEP	maximum extent practicable
MS4	Municipal Separate Storm Sewer System
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
OMC	Orting Municipal Code
PCD	Pierce Conservation District
Permit	Western Washington Phase II Municipal Stormwater Permit
Plan	SWMP Plan
SMAP	Stormwater Management Action Planning
SWPPPs	Stormwater Pollution Prevention Plans
TMDL	Total Maximum Daily Load
USGS	U.S. Geological Survey
WRRF	Water Recovery Resource Facility

SUBMITTED 2023 ANNUAL REPORT

Annual Report

Number	Permit Section	Question
1	S5.A	Attach a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.D.6. **Not Applicable**
2	S5.A	Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2) **SWMP_Plan_02.26.2021_2_09262023143406**
3	S5.A	Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP. **Yes**
4	S5.A.5.b	Coordinated among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b) **Yes**
5	S5.C.1.	Have you convened an interdisciplinary team to inform and assist in the development, progress, and influence of the comprehensive stormwater planning program? (S.5.c.1). August 1, 2020 **Yes**
14	S5.C.1.b	Did you submit a report as described in S5.C.1.b.i(b)? (Required to submit no later than January 1, 2023)

Number	Permit Section	Question
		Yes
15	S5.C.1.c	Continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces, native vegetation loss, and stormwater runoff, where feasible? See S5.C.1.c.i. (Required annually)
		Yes
16	S5.C.1.c	From the assessment described in S5.C.1.c.i(a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually)
		No
20	S5.C.2	Did you choose to adopt one or more elements of a regional program? (S5.C.2)
		No
21	S5.C.2	Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.
		Q21_S5.C.2 General Awareness e_21_09262023144510
24	S5.C.2	Began implementing strategy outlined in S.5.C.2.a.ii(c) (S5.C.2.a.ii(d) – Required by April 1, 2021)
		Yes
25	S5.C.2	Attach the report developed in accordance with S5.C.2.a.ii(e), which evaluated the changes in understanding and adoption of targeted behaviors resulting from the implementation of the strategy and any planned or recommended changes to the program in order to be more effective. (Required no later March 31, 2024)
		Q25.s5.c.2.A.II.(e) PE Rpt_25_09262023144510
26	S5.C.2	Promoted stewardship opportunities (or partnered with others) to encourage resident participation in activities such as those described in S5.C.2.a.iii.
		Yes

Number	Permit Section	Question
26a	S5.C.2	Attach a list of stewardship opportunities provided. **Q26a_S5.C.2.a.iii Stewardship _26a_09262023144511**
27	S5.C.3.	Describe in Comments field the opportunities created for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation, and updates of the Permittee's SWMP and the SMAP. (S5.C.3.a) **The City has monthly meetings, from help with Public Works committee (includes 2 Councilmembers, City Administrators, City Engineer, Public Works Director and City staff) and Public Hearings at the Council level when applicable.**
28	S5.C.3.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b) **Yes**
28a	S5.C.3.	List the website address in Comments field. **www.cityoforting.org**
29	S5.C.4.	Maintained a map of the MS4 including the requirements listed in S5.C.4.a.i-vii? **Yes**
30	S5.C.4.	Started mapping outfall size and material in accordance with S5.C.4.b.i? (Required no later than January 1, 2020) **Yes**
30a	S5.C.4.	Attach a spreadsheet that lists the known outfalls' size and material(s). **Q30a_S5.C.4 OF_30a_09262023144557**

Number	Permit Section	Question
31	S5.C.4.	Completed mapping connections to private storm sewers in accordance with S5.C.4.b.ii? (Required no later than August 1, 2023) **Yes**
33	S5.C.5	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste? (S5.C.5.b) **Yes**
33a	S5.C.5	Actions taken to inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. **Public Employees have quarterly training. Businesses and general public are informed through door hangers if there's an active IDDE clean-up in their area. Thru F.O.G. and source control inspections, businesses are educated on ID. Annual website postings, social media campaign and flyers mailed to each resident for continued education regarding IDDES.**
34	S5.C.5	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c. **Yes**
35	S5.C.5	Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i. **Yes**
35a	S5.C.5	Cite field screening methodology in Comments field. **Operations and maintenance staff regularly conduct site inspections of city owned facilities, development/construction sites and commercial properties for IDDEs. Inspection reports are entered into a GIS/asset management program and if required, follow-up actions are taken. In addition, the City participates in local events throughout the year, providing IDDE information and has posted on social media of the IDDE hazards to watch for and how to report IDDEs.**

Number	Permit Section	Question
36	S5.C.5	Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.) **15**
36a	S5.C.5	Cite field screening techniques used to determine percent of MS4 screened. **Through monthly and ongoing practices, the City of Orting inspects CBs, outfalls, storm retention ponds, while trained employees look for characteristics associated with illicit discharges.**
37	S5.C.5	Percentage of total MS4 screened from permit effective date through the end of the reporting year. (S5.C.5.d.i.) **100**
38	S5.C.5	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.C.5.d.ii) **The hotline # 253-377-0262 is posted on the City's website, often posted to social media and made available thru flyers during city events and also listed on the city's afterhours voicemail.**
39	S5.C.5	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii. **Yes**
40	S5.C.5	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e. **Yes**
41	S5.C.5	Municipal illicit discharge detection staff are trained to conduct illicit discharge detection and elimination activities as described in S5.C.5.f. **Yes**

Number	Permit Section	Question
42	S5.C.5	Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the Permittee as described in S5.C.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 12. **2023 IDDE Action Summary_42_12202023075454**
43	S5.C.6.	Implemented an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii. **Yes**
45	S5.C.6.	Number of adjustments granted to the minimum requirements in Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1) **0**
46	S5.C.6.	Number of exceptions/variances granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1) **Not Applicable**
47	S5.C.6.	Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.6.b.i. (S5.C.6.c.i) **Yes**
47a	S5.C.6.	Number of site plans reviewed during the reporting period. **7**
48	S5.C.6.	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii, that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 – Determining Construction Site Sediment Damage Potential? **Yes**

Number	Permit Section	Question
48a	S5.C.6.	If no, inspected, prior to clearing and construction, all construction sites meeting the minimum thresholds (S5.C.6.c.ii)? **Yes**
49	S5.C.6.	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii. **Yes**
49a	S5.C.6.	Number of construction sites inspected per S5.C.6.c.iii. **6**
49b	S5.C.6.	Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every 6 months per S5.C.6.c.iv? **No**
50	S5.C.6.	Inspected all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. (S5.C.6.c.v) **Yes**
51	S5.C.6.	Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects prior to final approval and occupancy being granted. (S5.C.6.c.v) **Yes**
52	S5.C.6.	Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects). (S5.C.6.c.ii-iv)(S5.C.7.c.viii) **Not Applicable**
53	S5.C.6.	Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi)

Number	Permit Section	Question
		Yes
54	S5.C.6.	Made Ecology's Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity available to representatives of proposed new development and redevelopment? (S5.C.6.d)
		No
55	S5.C.6.	All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites including permitting, plan review, construction site inspections, and enforcement are trained to conduct these activities? (S5.C.6.e)
		Yes
56	S5.C.7.	Implemented maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington or a Phase I program approved by Ecology per S5.C.7.a.?
		Yes
58	S5.C.7.	Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? If so, note in the Comments field what kinds of facilities are covered by this alternative standard. (S5.C.7.a)
		No
59	S5.C.7.	Verified that maintenance was performed per the schedule in S5.C.7.a.ii when an inspection identified an exceedance of the maintenance standard.
		Yes
59a	S5.C.7.	Attach documentation of maintenance time frame exceedances that were beyond the Permittee's control.
		Not Applicable

Number	Permit Section	Question
60	S5.C.7.	Implemented an ordinance or other enforceable mechanisms to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee per (S5.C.7.b.i (a))? **Yes**
61	S5.C.7.	Annually inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.7.b.i(b) **Yes**
61a	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.b.i (b) **Not Applicable**
62	S5.C.7.	Achieved at least 80% of scheduled inspections to verify adequate long-term O&M. (S5.C.7.b.ii) **Yes**
63	S5.C.7.	Annually inspected all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i) **Yes**
63a	S5.C.7.	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i) **21**
63b	S5.C.7.	Number of facilities inspected during the reporting period. **28**
63c	S5.C.7.	Number of facilities for which maintenance was performed during the reporting period. **23**

Number	Permit Section	Question
64	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.c.i. **Not Applicable**
65	S5.C.7.	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii. **Yes**
66	S5.C.7.	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S.5.C.7.c.iii) **Yes**
66a	S5.C.7.	Number of known catch basins? **1546**
66b	S5.C.7.	Number of catch basins inspected during the reporting period? **228**
66c	S5.C.7.	Number of catch basins cleaned during the reporting period? **6**
67	S5.C.7.	Attach documentation of alternative catch basin cleaning approach, if used. (S5.C.7.c.iii. (a)-(c)) **Not Applicable**
68	S5.C.7.	Implemented practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d) **Yes**

Number	Permit Section	Question
70	S5.C.7.	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.7.e) **Yes**
71	S5.C.7.	Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.7.f) **Yes**
74	S5.C.8	Established an inventory per S5.C.8.b.ii. (Required by August 1, 2022.) **Yes**
74a	S5.C.8	Number of total sites identified for the inventory. **26**
75	S5.C.8	Implemented an inspection program S5.C.8.b.iii (Required by January 1, 2023). **Yes**
76	S5.C.8	Implemented a progressive enforcement policy per S5.C.8.b.iv (Required by January 1, 2023). **Yes**
77	S5.C.8	Attach a summary of actions taken to implement the source control program per S5.C.8.b.iii and S5.C.8.b.iv. **Not Applicable**

Number	Permit Section	Question
78	S5.C.8	Attach a list of inspections, per S5.C.8.b.iii, organized by the business category, noting the amount of times each business was inspected, and if enforcement actions were taken. **Q78 S5.C.8_2023 SC Inspections_78_02052024102433**
79	S5.C.8	Implemented an ongoing source control training program per S5.C.8.b.v? **Yes**
80	S7	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A) **Not Applicable**
81	S7	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A) **Not Applicable**
82	S8	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2019 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.) **Yes**
84	S8	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2019 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)? **Yes**
87	S8	If conducting stormwater discharge monitoring in accordance with S8.C.1, attach a data and analysis report per S8.C.1. and Appendix 9. (Due annually beginning March 31, 2021.) **Not Applicable**

Number	Permit Section	Question
88	G3	Notified Ecology in accordance with G3 of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare or the environment. (G3) **Yes**
89	G3	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A. **Yes**
90	Compliance with standards	Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1) **Yes**
91	Compliance with standards	If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a. **Not Applicable**
92	Compliance with standards	Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3 and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d) **Not Applicable**
93	G20	Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20) **Not Applicable**
94	G20	Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field. **Not Applicable**

Attachments:

View Files Attached to Submission

	DocDescr	DocName	DocExt	DocID	SubID	AppName
View	WAR045016_42_12202023075454	2023 IDDE Action Summary_42_12202023075454	.xlsx	1473265	1871759	wqwebportal
View	Submitted Copy of Record for City of Orting	Copy of Record CityofOrting Tuesday February 6 2024	.pdf	1490951	1871759	wqwebportal
View	Submitted Cover Letter for City of Orting	Cover Letter CityofOrting Tuesday February 6 2024	.pdf	1490952	1871759	wqwebportal
View	WAR045016_21_09262023144510	Q21_S5.C.2 General Awareness e_21_09262023144510	.pdf	1443261	1871759	wqwebportal
View	WAR045016_25_09262023144510	Q25.s5.c.2.A.II.(e) PE Rpt_25_09262023144510	.pdf	1443262	1871759	wqwebportal
View	WAR045016_26a_09262023144511	Q26a_S5.C.2.a.iii Stewardship _26a_09262023144511	.pdf	1443263	1871759	wqwebportal
View	WAR045016_30a_09262023144557	Q30a_S5.C.4 OF_30a_09262023144557	.pdf	1443264	1871759	wqwebportal
View	WAR045016_78_02052024102433	Q78 S5.C.8_2023 SC Inspections_78_02052024102433	.pdf	1490470	1871759	wqwebportal
View	WAR045016_2_09262023143406	SWMP_Plan_02.26.2021_2_09262023143406	.pdf	1443256	1871759	wqwebportal

Close

ANNUAL REPORT QUESTIONS

Q.2 S5.A
Attached updated annual Stormwater Management program Plan (S5.A.2)
See Appendix A

Q.21 S5.C.2
Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.
See Appendix F

Q.25 S5.C.2 Attach the report developed in accordance with S5.C.2.a.ii(e), which evaluated the changes in understanding and adoption of targeted behaviors resulting from the implementation of the strategy and any planned or recommended changes to the program in order to be more effective.

Q.26a S5.C.2
Attached a list of stewardship opportunities provided.
See Appendix F

Q.30a S5.C.4.
Attach a spreadsheet that lists the known outfall size and material(s).
See Appendix F

Q.42 S5.C.5
Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the Permittee as described in S5.C.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 12.
See Appendix F

Q.78 S5.C.8
Attach a list of inspections, per S5.C.8.b.iii, organized by the business category, noting the amount of times each business was inspected, and if enforcement actions were taken.
See Appendix G

Q.79 S5.C.8
Implemented an ongoing source control training program per S5.C.5.b.v.
See Appendix G

APPENDIX A
PERMIT SECTION S5

STORMWATER MANAGEMENT PROGRAM PLAN

S5.C.1 STORMWATER PLANNING

Stormwater Planning is a new program that Permitees are required to implement to inform and assist in the development of policies and strategies.

- **S5.C.1.a – Interdisciplinary Team**
  The City of Orting has an inter-disciplinary team to inform and assist in the development, progress and influence of this program. These team members comprise of the Public Works Committee where policy issues are discussed and progressed as well as the Planning Commission where their expertise to advise in the planning of stormwater investments and actions to accommodate future growth in a way that emphasizes protection of designated uses and improves receiving water quality and habitat under both existing and anticipated future development conditions.

- **S5.C.1.b – Coordination with Long-Range Plan Updates**
  The city is required to describe how stormwater management needs and protection/improvement of receiving water health are (or are not) informing the planning update processes and influencing policies and implementation strategies in the City. The report shall describe the following:

  There are two deadlines associated with the Permit-required coordination:
  1. By March 31, 2021, the City is to respond to the series of stormwater planning annual report questions to describe how anticipated stormwater impacts on water quality were addressed, if at all, during the current Permit term in updates to the City's Comprehensive Plan or other applicable plans
  2. By January 1, 2023 the City submitted a report responding to the same questions from the March 31, 2021 annual report to describe how anticipated stormwater impacts on water quality were addressed, if at all, during the current Permit term in updates to the City's Comprehensive Plan or other applicable plans.

The City's current Comprehensive Plan and Shoreline Master Plan do consider stormwater and receiving water issues. The City will review those plans as it responds to the Stormwater Planning questions for the annual report due March 31, 2022. The City is in the process of updating its Comprehensive Plan and anticipates adoption by end of 2024; and Shoreline Master Plan updated when needed. Any changes to those based on further consideration of stormwater or receiving water issues will be addressed in the report due January 1, 2023.

- **S5.C.1.c.i – Low Impact Development Code-related Requirements**

The intent of this Permit section is to make Low-Impact Development (LID) the preferred and commonly used approach to site development through requiring the use of LID principles and LID Best Management Practice (BMP) when updating, revising, and developing development-related codes, rules, standards, or other enforceable documents. The City has updated its codes and standards to implement LID during prior Permit terms. In accordance with Permit Section S5.C.1.c(a), the City is to assess and document annually any newly identified administrative or regulatory barriers to the implementation of LID principles or LID BMPs. There were no administrative or regulatory barriers to implementing LID principles or LID BMPs identified in the March 31, 2019-2023 annual reports. Barriers, if identified, will be documented in future annual reports.

STORMWATER MANAGEMENT ACTION PLANNING (SMAP)

- **S5.C.1.d – Stormwater Management Action Planning**

Stormwater Management Action Planning (SMAP) is a new requirement under the current Permit. SMAP is to be conducted based on the *Stormwater Management Action Planning Guidance* (Ecology, 2019; Publication 19-10-010). The intent is to identify a high-priority watershed within the permittee's jurisdiction and consider how long-range planning and potential projects may help improve stormwater quality and receiving water quality and habitat. The SMAP can be completed by the permittee or in conjunction with other agencies, provided that the SMAP includes a catchment area within the permittee's jurisdiction.

SMAP resources to be used in conjunction with Ecology's *Stormwater Management Action Planning Guidance* are listed below:

- *Building Cities in the Rain; Watershed Prioritization for Stormwater Retrofits* (Washington State Department of Commerce, Publication 006; September 2016).
- Puget Sound Watershed Characterization Project (Ecology).
- https://ecology.wa.gov/Water-Shorelines/Puget-Sound/Watershed-characterization-project.
- Washington Environmental Health Disparities Map (Washington State Department of Health).
- https://www.doh.wa.gov/DataandStatisticalReports/WashingtonTrackingNetworkWTN/InformationbyLocation/WashingtonEnvironmentalHealthDisparitiesMap.
- EJSCREEN: Environmental Justice Screening and Mapping Tool (United States Environmental Protection Agency).
- https://www.epa.gov/ejscreen.

The City is included in the Mid-Puyallup Basin, which is part of the Puyallup-White River Basin. Pierce County leads the watershed planning for the Mid-Puyallup Basin. The Mid-Puyallup Basin Plan (Basin Plan) was adopted in 2005 and acts as a comprehensive guide to surface water management in areas in the Mid-Puyallup Basin. The City is an identified stakeholder in the Basin Plan. The Basin Plan will be one of the resources used for SMAP.

- **S5.C.1.d.i – Receiving Water Assessment**

Receiving Water Assessment. Permittees shall document and assess existing information related to their local receiving waters and contributing area conditions to identify which receiving waters are most likely to benefit from SMAP.
By March 31, 2022, the City is to submit:

1. A watershed inventory and a brief description of the relative conditions of the receiving waters and the contributing areas. The watershed inventory is to be submitted as a table with each receiving water name, its total watershed area, and the percent of the total watershed area that is in the City's jurisdiction.
2. The findings of the stormwater management influence assessment for each basin.
3. The receiving waters that will be included in the prioritization process if not all of the receiving waters will be included in the prioritization process.
4. A map of the delineated basins with references to the watershed inventory table.
5. The basins that are expected to have a relatively low stormwater management Influence for SMAP. Basins having relatively low-expected stormwater management influence do not need to be included in the prioritization process or the SMAP.

The City completed the receiving water assessment by March 31, 2022. **See Appendix E**

- **S5.C.1.d.i – Receiving Water Prioritization**

Based on the assessment and other relevant information, permittees are to develop and implement a prioritization method and process to determine which receiving waters will receive the most benefit from implementation of stormwater facility retrofits, tailored implementation of SWMP actions, and other land/development management actions. The retrofits and actions are to be designed to:

1. Conserve, protect, or restore receiving waters through stormwater and land management strategies that act as water quality management tools,
2. Reduce pollutant loading, and
3. Address hydrologic impacts from existing development as well as planned for and expected future buildout conditions.

By June 30, 2022, the City is to document the prioritized and ranked list of receiving waters. The City is also to document the process used to identify the high-priority receiving waters. Watershed management plans can be used as sources of information for the prioritization process. The ranking process is to identify the selected priority catchment area to be used for the SMAP.

The City has completed the receiving water prioritization by June 30, 2022.

- **S5.C.1.d.iii – SMAP**

By March 31, 2023, developed a SMAP for at least one high-priority catchment area selected above that includes the following:

1. A description of the stormwater facility retrofits needed for the catchment area, BMPs, and preferred locations.

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

3. Targeted, enhanced, or customized implementation of stormwater management actions from Permit Section S5, including the following. The identified actions can support the selected catchment area or the basin overall:
   a. IDDE field screening,
   b. Prioritization of Source Control inspections,
   c. O&M inspections or enhanced maintenance, or
   d. Public Education and Outreach behavior change programs.

4. Identification of changes needed, if applicable, to local long-range plans to address SMAP priorities.

5. A proposed implementation schedule and budget sources for:
   a. Short-term actions to be accomplished within 6 years, and
   b. Long-term actions to be accomplished within 7 to 20 years).

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

The City has completed the SMAP process for a prioritized catchment area and/or established funding for short- or long-term actions by March 31, 2023.

See **Appendix E** for final SMAP assessment.

PUBLIC EDUCATION AND OUTREACH

S5.C.2 PUBLIC EDUCATION AND OUTREACH

The City of Orting's public education and outreach program attempts to build general awareness that will ultimately reduce pollutants in stormwater and improve water quality in waters of the state. The program focuses on providing resources for information, services, and activities that may help people in the community to better understand stormwater best management practices. The city hopes that more knowledge and engagement of the community will adopt behaviors that can decrease damaging effects in stormwater.

The program is organized to follow and address minimum performance measures outlined in permit subsection S5.C.2.

a) Build General Awareness about methods to address and reduce impact from stormwater runoff.
b) Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.
c) Create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.

- **S5.C.2.a.i-Build General Awareness**
  It's the City's goal to continue improving awareness and involvement in stormwater management with the general public, including business, engineers, contractors, developers, land use planners, residents and property owners. The city refers to regional resources and local opportunities for education and stewardship for these target audiences.

  Social media campaign:
  For the last three years, the City provided material through a social media campaign from May thru August to build awareness for improving water quality. EPA Tips sheets, brochures and videos posted to social media focused on topics based off the 2020 stormwater impact survey. Topics ranged from car washing, vehicle oil changes, pet waste and lawn chemicals. However, the survey showed oil changes the real focus needed in the campaign. See Social Media Campaign viewers list in Appendix G.

Volunteer Programs include:

- Catch Basin/Curb Marking Program – Volunteers mark catch basins with signage indicating that the structure drains to a nearby surface water body. The Markers read "Dump No Waste, Drains to Stream".
- Car Wash Program – The City has purchased several car wash catch basin kits for groups performing car washing events. The kit includes a basin, pump to transport wash waster to grassy area and signage. The kit is borrowed by organizations such as local schools or churches throughout the year.

Future Volunteer Programs

- *Rainfall Monitoring Program* – Currently, the City's wastewater treatment plant (WWTP) has rainfall monitoring equipment. Additionally, the U.S. Geological Survey (USGS) has a rain gauge on the Carbon River. In the future, volunteers could be utilized to collect rainfall data at various locations within the city. By combining data from across the City, rainfall patterns could be analyzed and used to identify areas susceptible to erosion, as well as for flooding prediction and modeling.
- *Noxious Weed Control* – The City is a member of the Pierce Conservation District, with the properties within the City limits being assessed yearly in property taxes. With this program, the citizens can participate in volunteer events to remove noxious/invasive vegetation from riparian areas. Removal of noxious vegetation improves riparian and aquatic habitat and improves overall water quality. Additionally, teaches participants the benefits of healthy, native riparian vegetation in improving water quality
    - The City of Orting Public Works staff currently inspects city owned properties for noxious weeds as part of its monthly ongoing inspections.

- **S5.C.2.a.i.a-Build General Awareness with the General Public and Businesses**

The following measures supports building general awareness with the general public and businesses in the following subject areas outline in the permit.

a) General impacts of stormwater on surface waters
b) Impacts from impervious surfaces
c) Low Impact Development (LID) principals and LID Best Management Practices (BMPs)

The city achieves compliance with these subject areas by making available and advertising publicly the services, activities, and publications listed below.

- City of Orting 2021 Stormwater Management Program Plan
- City of Orting Shoreline Master Program
- City of Orting Website: www.cityoforting.org
- Jurisdiction partner with Pierce Conservation District www.piercecd.org
- Personal interaction via phone, in person, or email
- Environmental compliance inspections
- Source Control Inspections
- Fats, Oil, and Grease (FOG) inspections & BMPs

- Hazardous Waste Facility Inspections
- Response to private drainage concerns
- Operations and Maintenance activities
- Public Works Committee Monthly Meeting (Public)
- Annual direct mailings
- Public land use notices
- City Council and committee meetings
- Educational Brochures
- Enviroscape interactive presentation at City events.

- **S5.C.a.i.b-Build General Awareness with Engineers, Contractors, Developers and Land Use Planners**

  The City continues to build general awareness with engineers, contractors, developers and land use planners in the three following subject areas in the permit:

  a) Technical standards for stormwater sites and erosion control plans
  b) LID Principals and LID BMPs
  c) Stormwater treatment and flow control BMPs/facilities

  The City achieves compliance with these subject areas by making available and advertising publicly the services, activities, and publications listed below.

  - City of Orting 2021 Stormwater Management Program Plan
  - City of Orting Shoreline Master Program
  - City of Orting Design and Construction Standards
  - City Website: www.cityoforting.org
  - Personal interactions via phone, in person or email
  - Annual direct mailings
  - Environmental compliance inspections
  - Source control inspections
  - Orting Building Department
  - Development Reviews
  - Pre and Post construction meetings
  - Construction inspections
  - Building inspections
  - Erosion and sediment control inspections
  - Certified Erosion and Sediment Control Lead (CESCL) training
  - Professional conferences
  - WA DOE LID training opportunities

- **S.5.C.2.a.ii (a) – Effect Behavior Change**

The city promotes behavior change with residents, businesses, developers, and school age children regarding the use of BMPs that protect water quality. These BMPs include:

  - Use and storage of pesticides, fertilizers and or other household chemicals
  - Use and storage of automotive chemicals, hazardous cleaning supplies, carwash soaps and other hazardous materials
  - Prevention of illicit discharge
  - Yard Care
  - *Repair and Maintenance BMPs for: vehicles, equipment, and/or home/buildings.
  - Pet Waste management and disposal
  - LID Principals and LID BMPs
  - Stormwater facility maintenance, including LID facilities
  - Dumpster, and grease bin maintenance
  - Litter and debris prevention
  - Sediment and erosion control
  - Locally-important, municipal stormwater subject area BMPs

The behavior change the City aimed to influence was based off a recent survey is the Repair and Maintenance of vehicles and equipment. The survey found lack of information and resources to provide adequate disposal of hazardous liquids from vehicles and equipment. The City started a social media campaign from May thru August to target this audience and provided literature and videos to assist in the disposal and the environmental impacts due to improper disposal.

- **S5.C.2.a.ii (b) (e) – Measure Understanding and Adoption of Targeted Behaviors**

  The City continues to examine and reflect on its efforts in public education and outreach. To achieve greater awareness, the city utilizes social media and questionnaires to evaluate environmental understanding and measure behaviors adopted by individuals and groups. The city uses this information to identify successful resources for education and outreach.
  Between the lack of interest in the survey and social media viewers, it was difficult to determine and measure behavior change. See survey results and social media views & shares poll in Appendix G.
  (f) The City will continue annual social media campaigns in order to reach its community, to evaluate interests & behavior change. Kiosks at scheduled festivals and yearly farmers market for in-person outreach will continue as the City promotes these changes.

  *The Public Works Department visited local mechanic, automotive retail stores and found one location accepting- used oil. The city will continue to direct methods of oil storage, identify acceptable locations for disposal and automotive care by making information available through social media and in-person at city sponsored events.

- **S.5.C.2.a.iii – Create Stewardship Opportunities**
  - Puget Sound Starts Here
  - Community Volunteer Groups
  - Strom Drain Markers
  - Orting High School Students - Community Service Requirements for Graduation

S5.C.3 PUBLIC INVOLVEMENT AND PARTICIPATION

The City encourages public engagement in the SWMP plan. Public involvement and participation in the SWMP will be facilitated through the options below.

- **S5.C.3.a – Create Opportunities for Public Participation in SWMP**
  The City creates opportunities for public involvement and participation in the development and implementation of the SWMP Plan by posting documentation on line through its website and public notices. The same procedure will apply to the SMAP when implemented. The following are some of the ways for the public to provide comment to the city's SWMP documents and activities.
    - In person, during normal business hours or by appointment
    - Email to publicworks@cityoforting.org
    - City Council and Public Works Committee meetings.
    - Telephone 360-893-9039
    - Mail to P.O. Box 489, Orting, WA 98360

- **S5.C.3.b – SWMP Plan and Annual Report on Orting website.**
  The City of Orting provides the SWMP and annual report on line annually at www.cityoforting.org no later than May 31 each year as required under the permit. This document will remain online until the following year when it's updated with the current document. A hard copy can be made available by emailing publicworks@cityoforting.org.

S5.C.4 – MS4 MAPPING AND DOCUMENTATION

Section S5.C.3 of the 2013 Permit required on-going mapping of the MS4 under Illicit Discharge Detection and Elimination.
Section S5.C.4.b.i of the current Permit requires that, by January 1, 2020, permittees begin to collect information regarding size and material for all known MS4 outfalls as that information is obtained during the normal course of business, such as during field screening, inspection, or maintenance. The information is to be used to update records. *Completed in 2019.*
Permit Section S5.C.4.b.ii requires that, by August 1, 2023, permittees complete mapping of all known connections from the MS4 to a privately-owned stormwater system. *Completed in 2019*.
Permit Section S5.C.4.c requires that, by August 1, 2021, permittees use an electronic format for mapping, such as Geographic Information System (GIS), Computer Aided Design (CAD) software, or other software that can map and store point, lines, polygons, and associated attributes. GIS was *implemented in 2019 and is ongoing*.

The Stormwater Comprehensive Plan prepared for the City in May 2002, has a detailed stormwater system inventory for eight sub-basins delineated within the city, and a mapping system that accurately depicts the stormwater system inventory as it existed at that time.

The storm sewer system map has been updated to include detailed information regarding all stormwater infrastructure that has been added since 2002. Updates to the map include the

location and labeling of all catch basins, stormwater treatment facilities, stormwater outfalls, and structural BMPs.
Additionally, the City has updated the map to include information regarding the location of stormwater piping and what types of pipe material is present. The City's mapping system also includes the location of its two receiving waters, as well as land use information. The City continues to update its stormwater map on a routine basis to ensure that it accurately depicts all known stormwater system infrastructure owned, operated, or maintained by the City. Recently, the City updated its stormwater map and implemented a GIS based mapping system. City mapping includes both public and private stormwater systems and continues to update the GIS Mapping.

S5.C.5 – ILLICIT DISCHARGE DETECTION AND ELIMINATION

The City's SWMP includes an ongoing program designed to prevent, detect, characterize, trace and eliminate illicit connections and illicit discharges into the MS4.

The program includes procedures for reporting and correcting or removing illicit connections, spills and other illicit discharges when they are suspected or identified.

Illicit discharges and illicit connections are identified through field screening, inspections, complaints/reports, construction inspections, maintenance inspections, source control inspections and or monitoring information as appropriate.

This section is organized to follow and address the minimum performance measures outlined in permit subsection S5.C.5, with subparts denoted when appropriate.

- Illicit Discharge Identification (S5.C.5.a)
- Public Information Associated with IDDE (S5.C.5.b)
- Illicit Discharges Ordinance (S5.C.5.c)
- Detection Program (S5.C.5.d)
- Addressing Illicit Discharges (S5.C.5.e)
- Training (S5.C.5.f)
- Recordkeeping (S5.C.3.g)

- **S5.C.5.a Illicit Discharge Identification**
  Illicit discharges and illicit connections are identified through field screenings, inspections, complaints/reports, construction inspections, maintenance inspections, source control inspections and/or monitoring information, as appropriate. The IDDE program includes procedures for identifying and addressing pollutants entering the MS4 from an interconnected, adjoining MS4.

- **S5.C.5.b Public Information Associated with IDDE**
  The City keeps its public employees, businesses, and the general public informed of hazards associated with illicit discharges and improper disposal of waste. Staff members are trained through-out the year and work with the public, property owners and businesses while completed field inspections associated with illicit discharges. These groups are informed of BMPs for pollution prevention and proper waste disposal. These trainings may also be documented as part of the public education and outreach program as described in S5.C.2. All staff training is documented.

- **S5.C.5.c Illicit Discharge Ordinance**
  The regulatory mechanism to effectively prohibit non-stormwater, illicit discharges into the City's MS4 to the maximum extent allowable under state and federal law is the Illicit Discharge Ordinance. This ordinance was adopted and codified in City of Orting (COO) Code Chapter: 9-5A. This ordinance was adopted 8-31-2011; was amended in 10-11-2017 and again in 01-08-2020 to meet permit requirements.

- **S5.C.5.c.i Allowable Discharges**
  According to the permit and the ordinance the following types of discharges shall not be considered illicit discharges into the City's MS4:
    - Diverted stream flows
    - Rising groundwaters
    - Uncontaminated groundwater infiltration (as defined at 40 CFR 35.2005 (b)(20))
    - Uncontaminated pumped groundwater
    - Foundation drains
    - Air Conditioning condensation
    - Irrigation water from agricultural sources that is commingled with urban stormwater
    - Springs
    - Uncontaminated water from crawl space pumps
    - Footing drains
    - Flows from riparian habitats and wetlands
    - Non-stormwater discharges authorized by another NPDES or state waste discharge permit
    - Discharges from emergency firefighting activities and;
    - Dye testing using environmental friendly products for the purpose of testing or tracing source pollution.
    - Environmentally friendly de-chlorination tablets used for the purpose of flushing fire hydrants and water mains.

- **S5.C.5.c.ii Conditionally Allowable Discharges**
  The regulator mechanism may allow the following categories of non-stormwater discharges only if the stated conditions are met:
    - Discharges from potable water sources, including but not limited to water line flushing, hyper-chlorinated water line flushing, fire hydrant system flushing and pipeline hydrostatic test water.
    - Discharges from lawn watering or other irrigation runoff.

- Dechlorinated swimming pool, spa and hot tub discharges
- Street and sidewalk wash water, water used to control dust, and routine external building wash-down that does not use detergents.
- Other non-stormwater discharges. The discharges shall be in compliance with the requirements of a stormwater pollution prevention plan review by the city which addresses such discharges.

- **S5.C.c.iii Other Discharges**
  The city shall further assess and respond to any category of the aforementioned discharges identified as a significant source of pollutants to waters of the State.

- **S5.C.5.c.iv Escalating Enforcement Procedures & Compliance Strategy**
  Enforcement regarding illicit connections or illicit discharges will be performed by the city in accordance with section 9-5B-11 of the City Ordinance. (Ord. 911, 8-31-2011)

- **S5.C.5.d Detection Program**
  The city's detection program relies heavily on city staff, members of the public and those doing business in the city. Detection is achieved by training staff, having informed and attentive public using the spill hotline and through field screening.

- **S5.C.5.d.i Field Screening**
  The procedures for conducting investigations of the city's MS4, includes field screening and source control inspections.
  The City's field screening methodology is conducted using Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual (Herrera Environmental Consultants, Inc.; May 2013)
  Pursuant to the obligations of the permit, trained public works staff conducted field screening on 85% of the MS4 before December 31, 2020. With completion of 15% in 2021. In 2022, they conducted field screening on 15% of the MS4 before December 31, 2022 and in 2023 areas noted as problematic were the focus for field screening.

- **S5.C.5.d.ii Spill Reporting Hotline**
  The City's spill reporting hotline is (360) 893-2219 x333. This number is listed on the City website, in publications and during social media campaigns.

- **S5.C.5.d.iii Detection and Response Education and Outreach**
  The City continues to train its municipal field staff throughout the year. There are 16 members of public works and 6 are CESCL trained. The city maintains records of the trainings provides and the staff trained.

- **S5.C.5.e Addressing Illicit Discharges**
  The City implemented an ongoing program to address illicit discharges, including spills and illicit connections into the city's MS4. The program includes:

- **S5.C.5.e.i** Procedures for characterizing the nature of, and potential public or environmental concerns, any illicit discharges found by or report to the City.
- **S5.C.5.e.ii** Procedures for tracing the source of an illicit discharge; including visual inspections, and when necessary, opening manholes, using mobile cameras and collecting samples where applicable.
- **S5.C.5.e.iii** Procedures for eliminating the discharge, including notification of appropriate authorities; notification of property owners, technical assistance & follow-up.
- **S5.C.5.e.iv** Compliance with the previous 3 sections will be achieved by meeting the following timelines as outlined in permit section S4.C.5.e.iv.
  - Immediately respond to all illicit discharges, including spills, which are determined to be a threat to human health & the environment.
  - Investigate within 7 days, on average, any complaints, reports or monitoring information that indicates a potential illicit discharge
  - Initiate an investigation within 21 days of any report or discovery of a suspected illicit connection to determine the source of the connection.
  - Upon confirmation of an illicit connection, use the compliance strategy in a documented effort to eliminate the illicit connection within 6 months. All known illicit connections to the MS4 shall be eliminated.

- **S5.C.5.f Training**

  Similar to subsection S5.C.5.d.iii, the City employees provides quarterly group trainings for identification, termination, cleanup and reporting of illicit discharges, including spills, and illicit connections to conduct these activities. Follow-up training is provided annually and changes in procedures are addressed as they occur. There are 7 public works employees CESCL certified. This includes employees in the building department, stormwater, water and wastewater departments.

- **S5.C.5.g Record Keeping**

  The city documents, track & maintains all records of any activities associated with IDDEs. These records are stored electronically in the public works department in a shared directory with the engineering & building departments.

See **Appendix F** Reporting of Illicit Discharges for 2023.

CONTROLLING RUNOFF

S5.C.6 – CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT, AND CONSTRUCTION SITES

Orting has an ongoing development review and inspection program to reduce pollutants and stormwater flow rates from new development, redevelopment, and construction site activities. The program applies to public and private development, including roads.

- **S5.C.6.a Enforceable Mechanisms Addressing Runoff**
  Orting utilizes a combination of city codes, city standards, and adopted standards to establish authority and administer requirements for standards to control runoff. These different components for standards and authority are outline below. Copies of these codes and standards are always available to the public online and upon request.

- **S5.C.6.b.i Minimum Requirements**
  Orting requires all new development and redevelopment in the city to meet stormwater management standards that are substantially equivalent to the "Minimum Technical Requirements for New Development and Redevelopment" in Appendix 1 of the permit.

- **S5.C.6.b.ii Local Requirements**
  Local requirements include the following requirements, limitations and criteria that, when used to implement the minimum requirements in Appendix 1, will protect water quality, reduce the discharge of pollutants to the MEP, and satisfy the State requirement under Chapter 90.48 to apply AKART prior to discharge:
  - Site planning requirements
  - BMP selection criteria
  - BMP design criteria
  - BMP feasibility criteria
  - LID competing needs criteria
  - BMP limitations

- **S5.C.6.b.iii Legal Authority**
  The City of Orting has established legal authority to inspect and enforce maintenance standards for private stormwater facilities through the Orting Municipal Code (OMC 9-5A) and standards, and permitting process.

- **S5.C.6.c Permitting Process with Site Plan Review**

  The City's program includes site plan reviews during the permitting process; inspections and enforcement capability to meet the standards listed in (i) through (iv) below, for both private and public projects is also applied to ensure projects meet minimum and local requirements outlined in S5.C.5.b.

  i. Review all stormwater site plans for proposed development activities.
  ii. Inspect, prior to clearing and construction, of all known development sites that have a high potential for sediment transports based on definitions and minimum requirements thresholds found in Appendix 7 of the permit – *Determining Construction Site Sediment Damage Potential*, and enforcement as necessary.
  iii. Inspect all known permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls; and enforcement as necessary based on the inspection.
  iv. Management of maintenance activities of all stormwater treatment and flow control BMPs/facilities, and catch basins, in new residential developments every 6 months, until 90% of the lots are constructed, to identify maintenance needs and enforce compliance with maintenance standards as needed.
  v. Inspection of all permitted development sites upon completion of construction and prior to final approval of occupancy and to ensure proper installation of permanent stormwater facilities. Verify that maintenance plan is completed and responsibility for maintenance is assigned for stormwater treatment and flow control BMPs/facilities. Enforce as necessary based on the inspection
  vi. Compliance with the inspection requirements in (ii) through (v), above, shall be determined by the presence and records of an established inspection program designed to inspect all sites.
  vii. A program including a procedure for keeping records of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations and other enforcement records. Records maintenance inspections & activities.
  viii. An enforcement strategy implemented to respond to issues of non-compliance.

- **S5.C.6.d Construction Stormwater General Permit**

  Stormwater runoff from construction sites can carry sediment, chemicals and debris into our local waterways. The Department of Ecology requires regulated constructions sites to get coverage under the Construction Stormwater General Permit (CSWGP).

  The City of Orting works with developers when necessary to point them in the right direction to access the electron Construction Stormwater Permit Notice of Intent (NOI) form for construction activity and the Industrial Stormwater General Permit NOI form for industrial activity.

  The City will continue to enforce local ordinances controlling runoff from sites that are also covered by stormwater permits issued by Ecology.

- **S5.C.6.e City Staff Training**
  All City staff whose primary jobs for inspections and maintenance activities are trained annually and certified CESCLs. Follow-up training is provided when changes in procedures or regulations occur.

S5.C.7 OPERATIONS AND MAINTENANCE

The City's objective is to implement and document maintenance standards to the City's MS4 and well and stormwater facilities regulated by the City.

This section is organized to follow and address the minimum performance measures outlined in permit subsection S5.C.7.

- Maintenance Standards (S5.C.7.a)
- Maintenance of stormwater facilities regulated by the City (S5.C.7.b)
- Maintenance of stormwater facilities owned or operated by the City (S5.C.7.c)
- Inspection of Flow Control and Treatment Facilities (S5.C.7.c.i)
- Spot Inspections (S5.C.7.c.ii)
- Catch Basin Inspections, Maintenance & Cleaning (S5.C.7.c.iii)
- 95% Minimum Compliance (S5.C.7.c.iv)
- Best Management Practices (S5.C.7.c.d)
- Stormwater Management Training Program (S5.C.7.e)
- Stormwater Pollution Prevention Plan (S5.C.7.f)
- Maintain Records of Activities (S5.C.7.g)

Information from this section is used as a training guide to inform public works operations of those requirements.

- **S5.C.7.a Minimum Performance Measures – Maintenance Standards**
  The City of Orting's MS4 and source control facilities adhere to the maintenance standards of the 2019 Stormwater Management Program Plan as well as the 2013 Development Standards. Both documents can be found on the city's website or by contacting the public works office or building department for an electronic version of either document.

  Maintenance deficiencies are discovered through inspections, where field crew identify maintenance needs and document those required needs through an asset management work order program. These standards have the following timelines:
  - Within 6 months for catch basins
  - Within 1 year for typical maintenance of facilities, except catch basins
  - Within 2 years for maintenance that requires capital construction of less than $25,000

  For each exceedance of the above timeline for maintenance, the city will document the circumstance and remedy as appropriate.

- **S5.C.7.b Maintenance of Stormwater Facilities Regulated by the City**
  Orting verifies long-term operation & maintenance (O&M) of permanent stormwater treatment and flow control BMPS/facilities that are permitted and constructed pursuant to S5.C.6.c

  S5.C.7.b.i.a Provisions include implementation of its ordinance as the enforceable mechanism that:
    - Clearly identifies the party responsible for maintenance in accordance with maintenance standards established under S5.C.7.a
    - Requires inspection of facilities in accordance with the requirements in (b), below
    - Establishes enforcement procedures

  S5.C.7.b.i.b Maintenance Inspection frequency of all stormwater treatment and flow control BMPs/facilities that discharge into the MS4 and were permitted by the city according to S5.C.6.c. Inspection frequency will be performed annually unless there are maintenance records to justify a different frequency.

- **S5.C.7.c.i Maintenance of Stormwater Facilities Owned or Operated by the City**
  The City has a program to annually inspect all municipally owned and operated stormwater treatment and flow control BMPs/facilities, and takes appropriate maintenance actions in accordance with the adopted maintenance standards where applicable.
  Inspection frequency will occur annually unless records justify a difference frequency. All inspection visits are documented and recorded utilizing an electronic database entry method with preset RM Form/Checklists.

  S5.C.7.c.ii Spot Check Inspections
  Spot Check Inspections occur prior to and after high water events. Appropriate maintenance actions will be addressed as needed.

  S5.C.7.c.iii Catch Basin and Inlet Inspection, Maintenance, and Cleaning
  Inspections of all publicly owned catch basins and inlets in the City will be inspected at least once every two years. All inspection visits are documented and recorded utilizing an electronic database entry methods with preset RM Form/Checklists.

  S5.C.7.c.iv Minimum Compliance
  The City continues to achieve 95% compliance with inspection requirements in S5.C.7.c.i-iii above.

- **S5.C.7.d Best Management Practices**
  Best Management Practices help reduce stormwater impacts associated with runoff from all lands owned and maintained by the City, including road maintenance activities under the functional control of the City. The City's stormwater and street maintenance departments routinely ensure the following activities are addressed annually or as needed more frequently:

- Pipe Cleaning
- Cleaning of culverts that convey stormwater in ditch systems
- Ditch Maintenance
- Street Cleaning
- Road repair and resurfacing, including pavement grinding
- Snow and ice control
- Utility installation
- Pavement striping
- Roadside Maintenance, including vegetation management
- Dust control
- Application of fertilizers, pesticides and herbicides
- Sediment and erosion control
- Landscape maintenance and vegetation disposal
- Trash and pet waste management
- Building exterior cleaning and maintenance

- **S5.C.7.e Stormwater Management Training Program**
  The City's Stormwater Management Training Program is an ongoing program for the employees whose primary job is in the construction, operations or maintenance where functions may impact stormwater quality. The training program addresses the importance of protecting water quality, operation and maintenance standards, inspection procedures, relevant SWPPPS, selecting appropriate BMPs, ways to perform their job activities to prevent or minimize water quality concerns. Follow-up training occurs annually or as certifications need to be renewed.

- **S5.C.7.f Stormwater Pollution Prevention Plan**
  The City is in the process of developing a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned and operated by the City. This plan will include BMPs, inspections, inventory of materials and equipment, site map indicating the facilities stormwater drainage and discharge points and a plan for preventing and responding to spills at the facility.

- **S5.C.7.g Maintain Records of Activities**
  The City maintains records of its activities as required by this Section.

S5.C.8 SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

The Source Control Program is a new requirement under the current 2019-2024 permit. The City will begin to implement the program to prevent and reduce pollutants in runoff from areas that discharge to the MS4. This program includes the inspection of publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4.

The program will follow and address the minimum performance measures as outlined in permit subsections S5.C.8.

a) S5.C.8.a Source Control Program Elements

The Source Control Program will include the following four elements:

- **S5.C.8.a.i** Application of operational source control BMPs and if necessary, structural source control BMPs, or treatment BMPs/facilities, or both, to pollution generating sources associated with land uses and activities
- **S5.C.8.a.ii** Inspections of pollutant generating sources at publicly and privately owned institutional, commercial and industrial sites to enforce implementation of required BMPs to control pollution discharging into the MS4
- **S5.C.8.a.iii** Application and enforcement of local ordinances at sites, identified pursuant to S5.C.8.b.ii, including sites with discharges authorized by a separate NPDES permit.
- **S5.C.8.a.iv** Practices to reduce polluted runoff from the application of pesticides, herbicides, and fertilizers from the sites identified in the inventory.

b) S5.C.8.b Minimum Performance Measures

S5.C.8.b.i Enforceable Mechanism

By August 1, 2022, the City adopted and made effective an ordinance (Orting Municipal Code 9-5B-11 and 9-5B-12 of Article 13; requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities. (See Appendix 8 to identify pollutant generating sources.)

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

Applicable operational source control BMPs shall be required for all pollutant generating sources. Structural source control BMPs, or treatment BMPs/facilities, or both, shall be required for pollutant generating sources if operational source control BMPs do not prevent illicit discharges or violations of surface water, groundwater, or sediment management standards because of inadequate stormwater controls. Implementation of source control requirements may be done through education and technical assistance programs, provided that formal enforcement authority is available to the Permittee and is used as determined necessary by the Permittee, in accordance with S5.C.8.b.iv, below.

S5.C.8.b.ii Source Control Program Facility Inventory

The City established an inventory in 2019 that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4. The inventory includes:

- **a)** Business and/or sites identified based on the presence of activities that are pollution generating as identified above;
- **b)** Other pollutant generating sources, based on complaint respond, such as home-based businesses and multi-family sites.

S5.C.8.b.iii Source Control Inspection Program

By January 1, 2023, the City shall implement an inspection program for sites identified in the list. (S5.C.8.b.ii) The City implemented this program and is providing information about activities that may generate pollutants and the source control requirements applicable to those activities. See Permit Section S5.C in Appendix A for additional information.

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

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

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

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

S5.C.8.b.iv Progressive Enforcement Policy

By January 1, 2023, the City implemented a progressive enforcement policy (Orting Municipal Code 9-5B-11) that requires sites to comply with stormwater requirements. The policy includes the following:

- **a)** If the City determines that a site has failed to adequately implement required BMPs, the City is to take appropriate follow-up action(s), which may include phone calls, reminder letters, emails, or follow-up inspections.
- **b)** If the City determines that a site has failed to adequately implement BMPs after a follow-up inspection(s), the City is to take enforcement action as established through authority in its municipal codes or ordinances, or through the judicial system.
- **c)** The City is to maintain records, including documentation of each site visit, inspection reports, warning letters, notices of violations, and other enforcement records, demonstrating an effort to bring sites into compliance. The City is also to maintain records of sites that are not inspected because the property owner denies entry.
- **d)** The City can also refer non-emergency violations of local ordinances to Ecology if the City has made a documented effort of progressive enforcement. The minimum

progressive enforcement effort is to include documentation of inspections and warning letters or notices of violation.

The City has implemented a progressive source control enforcement policy by January 1, 2023.

S5.C.8.b.v Staff Training

The City is also required to implement an on-going training program for staff who are responsible for implementing the source control program. The training is to cover the legal authority for source control, source control BMPs and their proper application, inspection protocols, lessons learned, typical cases, and enforcement procedures. Follow-up training is to be provided as needed to address changes, such as changes in procedures, techniques, requirements, or staff. The City is to document and maintain records of the training.

The City has not yet implemented the on-going source control program training but is planning to do.

S4 COMPLIANCE STANDARDS

Permit Section S4.F identifies actions required by permittees if there is a discharge into waters of the state that would violate surface water quality standards, groundwater quality standards, sediment management standards, or human health-based criteria. If there is a prohibited discharge, permittees are to notify Ecology. After Ecology reviews the notification, Ecology may determine that an Adaptive Management Response is required. If an Adaptive Management Response is required, the permittee is required to review its SWMP and submit a report to Ecology in accordance with Permit Section S4.F.3.

The report is to include the following:

- A description of the operational and/or structural BMPs that are currently being implemented to prevent or reduce any pollutants that are causing or contributing to the violation of Water Quality Standards, including a qualitative assessment of the effectiveness of each Best Management Practice (BMP).
- A description of potential additional operational and/or structural BMPs that will or may be implemented in order to apply AKART on a site-specific basis to prevent or reduce any pollutants that are causing or contributing to the violation of Water Quality Standards.
- A description of the potential monitoring or other assessment and evaluation efforts that will or may be implemented to monitor, assess, or evaluate the effectiveness of the additional BMPs.
- A schedule for implementing the additional BMPs including, as appropriate: funding, training, purchasing, construction, monitoring, and other assessment and evaluation components of implementation.

After the report is reviewed and finalized, each annual report is to summarize the status of implementing the Adaptive Management Response and the results of any monitoring, assessments or evaluations that were required to be performed.

There have been no discharges from the City's MS4 that have resulted in a violation requiring Ecology notification and an Adaptive Management Response.

S7 COMPLIANCE WITH TMDL

Permit Appendix 2 identifies the waterbodies with TMDLs applicable to NPDES Phase II permittees. Although Permit Appendix 2 lists 20 TMDLs, including one for the Puyallup River, there are no TMDL requirements applicable to the City. The TMDL for the Puyallup River is for fecal coliform. The applicable MS4 permittees identified in the Permit are King and Pierce counties and the cities of Auburn, Edgewood, Enumclaw, Puyallup, and Sumner. The waterbodies identified for TMDL actions are downstream of Orting.

S8 MONITORING AND ASSESSMENT

Regional Status and Trends Monitoring was a requirement in the prior Permit. Permittees had the option to either pay into a fund to support a regional monitoring program or to develop a monitoring plans specifically for the permittee's Permit coverage area. The City chose to participate in the regional program and has notified Ecology. The City has submitted payments to Ecology.

APPENDIX B
PERMIT REQUIREMENTS IMPLEMENTATION TABLE

Western Washington Phase II Municipal Stormwater Permit Overview – 2019-2024

The timeline below provides an overview of major program deadlines for implementing permit requirements of S5 Stormwater Management Program (SWMP) and S8 Monitoring and Assessment for continuing City, Town, and County Permitees (By Date means "no later than…"). This is guidance only. Table does not include all ongoing program elements. Please see the permit for additional detail and related requirements.

S5 Permit Components	Ongoing Program Implementation	2019	2020	2021	2022	2023	2024
A.: Stormwater Management Planning	**Annually** update & submit the SWMP with Annual Report (S9) o A.3.a $ tracking: track the cost (or estimate) of development and implementation of each component of the SWMP o A.3.b activity tracking: track # of inspections, follow up actions, official enforcement, public education activities						
A.5 Coordination	**Ongoing** coordination			**By March 31:** Submit description of internal coordination mechanisms			
C.1 Stormwater Planning		**Annually** assess and report LID code-related requirements.	**By Aug. 1:** Convene interdisciplinary team to lead SW Planning program.	**By March 31:** Respond to series of Annual Report (AR) questions describing SW Planning during 13-19 permit	**By March 31**: Submit watershed inventory **By June 30:** Document the prioritized and ranked list of receiving water basins.	**By Jan. 1:** Submit report of responses to SW Planning AR questions for coordination of long range plans during this permit term **By March 31:** Develop Stormwater Management Action Plan (SMAP) for at least 1 high priority area.	
C2. Public Education and Outreach	**Ongoing** implementation of education & outreach		**By July 1**: Conduct new evaluation of effectiveness of current behavior change campaign	**By Feb 1:** Follow community-based social marketing practices, or similar, to develop or modify behavior change campaign tailored to the community **By April 1:** Implement Strategy developed in S5.C.2.a.ii.(c)			**By March 31:** Evaluate & report on implemented strategy
C.3 Public Involvement and Practices	**Ongoing** -Create opportunities for public, including overburdened communities, to participate in SWMP and SMAP -Post to website SWMP and Annual Report by **May 31** each year						
C.4 MS4 Mapping and Documentation	**Ongoing** Maintain mapping data		**By Jan 1:** Begin to collect size and material for all known MS4 outfalls	**By Aug 1:** mapping data in electronic format with fully described mapping standards		**By Aug 1:** Complete mapping all known MS4 connections to privately-owned stormwater systems	

S5 Permit Components	Ongoing Program Implementation	2019	2020	2021	2022	2023	2024
C.5 Illicit Discharge Detection and Elimination	**Ongoing** **-**Implement program to prohibit, address, and eliminate illicit discharges. -Train Staff	**By Aug 1**: Begin racking total % of MS4 screened	**By Mar 31:** MAY begin using WQwebIDDE form for annual reporting -if using own tracking: submit as much of the info as possible in format requested (or similar)	**By Mar 31:** Required to use WQwebIDDE form for annual reporting -if using own tracking: submit .xml file that follows the schema, but may submit alternative formats (i.e. .xls,. csv, .txt)	**By Mar 31:** If using own tracking system for recordkeeping, submit a .xml that follows the data schema		
C.6 Controlling Runoff	-implement & enforce program to reduce pollutants in runoff. -Train staff.				**By June 30**: Adopt and make effective program that meets requirements of App. 1 or equivalent PH I program. (See permit for other dates)		
C.7 Operations and Maintenance	-inspect & maintain stormwater facilities and catch basins controlled by & regulated by the Permittee. -Implement practices, policies, and procedures to reduce SW impacts from all permittee lands. -Train staff.				**By June 30:** Update maintenance standards **By Dec 31:** Document practices, policies, and procedures to reduce SW impacts from all permittee lands. **By Dec 31:** Update SWPPPs for heavy equipment maintenance or storage yards/facilities.		
C.8 Source Control					**By Aug 1:** **-**Adopt & make effective ordinances requiring source control BMPs. -Establish inventory of properties with potential to generate pollutants to Permittee's MS4	**By Jan 1:** -Implement inspection program -Implement progressive enforcement policy -Train staff	

S8 Monitoring and Assessment

S8 Permit Components	2019	2020	2021	2022	2023	2024
S8.A Regional status and trends monitoring	**By Dec 1**: submit payment to collective fund if payed into during 2013 permit. -Submit Written notification of option selected	**By Aug. 15**: if option chosen, make annual payments to collective fund				
S8.B SWMP Effectiveness and Source ID	**By Dec 1:** submit payment to collective fund if payed into during 2013 permit. -Submit written notification of option selected	**By Aug. 15**: If option chosen, make annual payments to collective fund				
S8.C Stormwater discharge monitoring		**By Feb 1:** if option chosen, submit draft QAPP for review and approval By Aug 15: Submit final QAPP for approval within 60 days of receiving approval of draft By Oct 1: Begin flow monitoring	**By Oct 1:** Fully implement discharge monitoring	**By Mar 31:** Annual report data and analysis in accordance with QAPP. Enter water & solids concentrations data into EIM		

Other significant elements of the permit

S1 Application for Coverage	Co-Permittees can end or emend agreements at anytime
S4.F Response to violations of Water Quality Standards	Notification and possible adaptive management may occur at any time.
S7 Compliance with Total Maximum Daily Load (TMDL)	Comply with applicable TMDL requirements listed in Appendix 2 per individual timelines.
S9 Reporting	Keep all records related to the permit for at least five years. Beginning March 31, 2020, annually submit a report for the previous calendar year using WQwebPortal.
G3 Notification of Discharge Including Spills: Report discharge into or from the MS4 of which could constitute a threat to human health, welfare or the environment.	Discharge to water: Call Emergency management Division (EMD) 1-800-645-7911 or 1-800-258-5990 Discharge to/from MS4: Report to Ecology within 24 hours (do not need to report if EMD has been called).
G.18 Duty to Reapply	Apply for permit renewal no later than Feb 2, 2024 (180 days before permit expiration).
G20 Non-Compliance Notification	Notify Ecology within 30 days of becoming aware of permit non-compliance.

APPENDIX C
CONSTRUCTION SITE INSPECTION FORM

Construction Stormwater Site Inspection Form

Project Name _____ Permit # _____ Inspection Date _____ Time _____

Name of Certified Erosion Sediment Control Lead (CESCL) or qualified inspector if *less than one acre*
Print Name: _____

Approximate rainfall amount since the last inspection (in inches): _____

Approximate rainfall amount in the last 24 hours (in inches): _____

Current Weather Clear ☐ Cloudy ☐ Mist ☐ Rain ☐ Wind ☐ Fog ☐

A. Type of inspection: Weekly ☐ Post Storm Event ☐ Other ☐

B. Phase of Active Construction (*check all that apply*):

Pre Construction/installation of erosion/sediment controls	☐	Clearing/Demo/Grading	☐	Infrastructure/storm/roads	☐
Concrete pours	☐	Vertical Construction/buildings	☐	Utilities	☐
Offsite improvements	☐	Site temporary stabilized	☐	Final stabilization	☐

C. Questions:

1. Were all areas of construction and discharge points inspected? Yes ___ No ___
2. Did you observe the presence of suspended sediment, turbidity, discoloration, or oil sheen Yes ___ No ___
3. Was a water quality sample taken during inspection? (*refer to permit conditions S4 & S5*) Yes ___ No ___
4. Was there a turbid discharge 250 NTU or greater, or Transparency 6 cm or less?* Yes ___ No ___
5. If yes to #4 was it reported to Ecology? Yes ___ No ___
6. Is pH sampling required? pH range required is 6.5 to 8.5. Yes ___ No ___

If answering yes to a discharge, describe the event. Include when, where, and why it happened; what action was taken, and when.

_____

_____

_____

*If answering yes to # 4 record NTU/Transparency with continual sampling daily until turbidity is 25 NTU or less/ transparency is 33 cm or greater.

Sampling Results: Date: _____

Parameter	Method (circle one)	Result			Other/Note
		NTU	cm	pH	
Turbidity	tube, meter, laboratory				
pH	Paper, kit, meter				

D. Check the observed status of all items. Provide "Action Required "details and dates.

Element #	Inspection	BMPs Inspected			BMP needs maintenance	BMP failed	Action required (describe in section F)
		yes	no	n/a			
1 Clearing Limits	Before beginning land disturbing activities are all clearing limits, natural resource areas (streams, wetlands, buffers, trees) protected with barriers or similar BMPs? (high visibility recommended)						
2 Construction Access	Construction access is stabilized with quarry spalls or equivalent BMP to prevent sediment from being tracked onto roads?						
	Sediment tracked onto the road way was cleaned thoroughly at the end of the day or more frequent as necessary.						
3 Control Flow Rates	Are flow control measures installed to control stormwater volumes and velocity during construction and do they protect downstream properties and waterways from erosion?						
	If permanent infiltration ponds are used for flow control during construction, are they protected from siltation?						
4 Sediment Controls	All perimeter sediment controls (e.g. silt fence, wattles, compost socks, berms, etc.) installed, and maintained in accordance with the Stormwater Pollution Prevention Plan (SWPPP).						
	Sediment control BMPs (sediment ponds, traps, filters etc.) have been constructed and functional as the first step of grading.						
	Stormwater runoff from disturbed areas is directed to sediment removal BMP.						
5 Stabilize Soils	Have exposed un-worked soils been stabilized with effective BMP to prevent erosion and sediment deposition?						

Construction Stormwater Site Inspection Form

Element #	Inspection	BMPs Inspected			BMP needs maintenance	BMP failed	Action required (describe in section F)
		yes	no	n/a			
5 Stabilize Soils Cont.	Are stockpiles stabilized from erosion, protected with sediment trapping measures and located away from drain inlet, waterways, and drainage channels?						
	Have soils been stabilized at the end of the shift, before a holiday or weekend if needed based on the weather forecast?						
6 Protect Slopes	Has stormwater and ground water been diverted away from slopes and disturbed areas with interceptor dikes, pipes and or swales?						
	Is off-site storm water managed separately from stormwater generated on the site?						
	Is excavated material placed on uphill side of trenches consistent with safety and space considerations?						
	Have check dams been placed at regular intervals within constructed channels that are cut down a slope?						
7 Drain Inlets	Storm drain inlets made operable during construction are protected.						
	Are existing storm drains within the influence of the project protected?						
8 Stabilize Channel and Outlets	Have all on-site conveyance channels been designed, constructed and stabilized to prevent erosion from expected peak flows?						
	Is stabilization, including armoring material, adequate to prevent erosion of outlets, adjacent stream banks, slopes and downstream conveyance systems?						
9 Control Pollutants	Are waste materials and demolition debris handled and disposed of to prevent contamination of stormwater?						
	Has cover been provided for all chemicals, liquid products, petroleum products, and other material?						
	Has secondary containment been provided capable of containing 110% of the volume?						
	Were contaminated surfaces cleaned immediately after a spill incident?						
	Were BMPs used to prevent contamination of stormwater by a pH modifying sources?						

Construction Stormwater Site Inspection Form

Element #	Inspection	BMPs Inspected			BMP needs maintenance	BMP failed	Action required (describe in section F)
		yes	no	n/a			
9 Cont.	Wheel wash wastewater is handled and disposed of properly.						
10 Control Dewatering	Concrete washout in designated areas. No washout or excess concrete on the ground.						
	Dewatering has been done to an approved source and in compliance with the SWPPP.						
	Were there any clean non turbid dewatering discharges?						
11 Maintain BMP	Are all temporary and permanent erosion and sediment control BMPs maintained to perform as intended?						
12 Manage the Project	Has the project been phased to the maximum degree practicable?						
	Has regular inspection, monitoring and maintenance been performed as required by the permit?						
	Has the SWPPP been updated, implemented and records maintained?						
13 Protect LID	Is all Bioretention and Rain Garden Facilities protected from sedimentation with appropriate BMPs?						
	Is the Bioretention and Rain Garden protected against over compaction of construction equipment and foot traffic to retain its infiltration capabilities?						
	Permeable pavements are clean and free of sediment and sediment laden-water runoff. Muddy construction equipment has not been on the base material or pavement.						
	Have soiled permeable pavements been cleaned of sediments and pass infiltration test as required by stormwater manual methodology?						
	Heavy equipment has been kept off existing soils under LID facilities to retain infiltration rate.						

E. Check all areas that have been inspected. ✔

All in place BMPs ☐ All disturbed soils ☐ All concrete wash out area ☐ All material storage areas ☐
All discharge locations ☐ All equipment storage areas ☐ All construction entrances/exits ☐

F. Elements checked "Action Required" (section D) describe corrective action to be taken. List the element number; be specific on location and work needed. Document, initial, and date when the corrective action has been completed and inspected.

Element #	Description and Location	Action Required	Completion Date	Initials

Attach additional page if needed

Sign the following certification:

"I certify that this report is true, accurate, and complete, to the best of my knowledge and belief"

Inspected by: (print) _____ (Signature) _____ Date: _____

Title/Qualification of Inspector: _____

APPENDIX D
PERMIT SECTION: APPENDIX 8

APPENDIX 8 – Businesses and Activities that are Potential Sources of Pollutants

Use this appendix to help identify businesses and/or activities with potential outdoor pollutant-generating sources that discharge to the MS4 and should be included in the Permittee's source control inventory, developed pursuant to S5.C.8.b.ii. The Standard Industrial Code (SIC), Major Group, and NAICS numbers are provided for reference. Permittees may include additional outdoor pollutant-generating sources that are located within their jurisdictions.

Group Description	SIC Major Group	SIC Industry Group No.	NAICS Major Group
Support Activities for Animal Production		074, 075	1152xx,
Construction of Buildings	15		236
Heavy and Civil Engineering Construction	16		237
Specialty Trade Contractors	17		238
Beverage, Food, and Tobacco Manufacturing	20		311, 312
Wood Product Manufacturing	24		321
Paper Manufacturing	26		3221xx, 3222xx
Printing and Related Support Activities	27		323
Chemical Manufacturing	28		325
Petroleum and Coal Products Manufacturing	29		3241xx
Plastics and Rubber Product Manufacturing	30		326
Leather and Allied Product Manufacturing	31		316
Nonmetallic Mineral Product Manufacturing	32		327
Primary Metal Manufacturing	33		331
Fabricated Metal Product Manufacturing	34		332
Machinery, Computer, and Electronic Product manufacturing	35		333, 334
Electrical Equipment, Appliance, and Component Manufacturing	36		335
Transportation Equipment Manufacturing	37		336
Rail Transportation	40		482

Group Description	SIC Major Group	SIC Industry Group No.	NAICS Major Group
Transit and Ground Passenger Transportation	41		485
Truck Transportation and Warehousing	42		484, 493
Support Activities for Transportation		473, 474, 478	4881xx, 4882xx, 4884xx, 4889xx,
Utilities	49		2211xx
Wholesale Trade – Durable Goods		501, 503, 505, 506, 507, 509	423140, 423930, 423110, 4233xx, 4237xx, 4238xx,
Wholesale Trade – Nondurable Goods		514, 515, 516, 517, 518, 519	424930, 4244xx, 4246xx, 4247xx, 4248xx,
Building Materials, Hardware, Garden Supplies Dealers		521, 523, 526	444
Food and Beverage Stores	54		445
Automotive Dealers and Gasoline Service Stations	55		441, 447
Food Services and Drinking Places	58		722
Rental and Leasing Services		735	5321xx, 5324xx
Repair and Maintenance	75		811192, 8111xx, 8112xx, 8113xx, 8114xx,
Ambulatory Health Care Services and Hospitals		806, 807	621910,
Educational Services	82		6111xx, 6112xx, 6113xx, 6115xx
Museums, Historical Sites, and Similar Institutions		842	712

APPENDIX E
SMAP

Submitted to Ecology as required.

Technical Document can be found on city website:
www.cityoforting.org

APPENDIX F
ILLICIT DISCHARGE REPORTING

Annual Report Question Q42_S5.C.5_IDDE Action Summary

ID	Date Investigated	Characterize	Trace	Eliminate	Date Actions completed
WO 9732	2/17/2023	Antifreeze Fluid	Leak from vehicle parked outside of business on South 100 Block of Wa Ave S.	**ERTS # 720910** at 11:15 a.m. received a call from citizen regarding a spill leaking from a vehicle. The spill traveled in the curb/gutter from 128 Washington Ave S, heading North. The spill continued to the end of the block where it entered CB # SwIN_250. The storm main then leads East, crosses Calistoga St E and was stopped from traveling further at CB# SwIN_238. Pro-Vac was called out to pump the CBs and main. Roughly 200 gallons was removed.	2/17/2023
WO 10014	7/14/2023	Vehicle Oil	Leak from vehicle parked in front of home near storm drain SwIN_409	ERTS # 724082 - vehicle parked over stormdraim while leaking fluids. City vactored out CB and checked surrounding CBs if fluids migrated through storm line.	ongoing inspections & investigation
WO 10769	8/1/2023	sewage	SIDE SEWER CONNECTED TO RESIDENTIAL STORM LINE	ERTS 724560 - **306 LANE BLVD NW** - SD 8/3 - Called by Brittan and Matt to come check potential sewer connection to down spouts. arrived and found sewer coming out of the downspouts, talked with homeowner and let them know we would be out in the morning to tv the line. SD 8/4 - TV sewer line and found no obstruction to the street, when we tv back to the house we found that the camera fell out of the pipe and was just sitting under the house. The sewer line was not connected. We spoke with David Fox who is the contractor hired by the property management, about the potential for a sewer connection to the storm line. Contractor uncovered the side sewer and storm line. Found that the sewer line was connected to the storm line causing the back up. According to the contractor these repairs were made 5 years prior. We informed homeowner of the issue. Contractor disconnected the sewer line from the storm line and capped the storm line and installed a clean out. They reconnected the sewer line from the house to the sewer system. We then TV the storm line from the CB back to the houses and found the plug from 303. Setting up vactor to suck out the CB`s and jet the storm line. We took fecal samples of the pond that the storm line discharges to and will continue to monitor.	ongoing inspections - fecal testing complete
WO 10830	8/10/2023	sewage	Spill from Vactor Truck	ERTS # 724669 @ City Lift Station on Hansberry & Gipple - JE 8-10-23: Pro vac was on site to knock down grease ring and vac solids and grease out of wet wells, while at Carbon River the Laborer trainee had the controller for the truck and accidentally released the back door and had sewer come out and go in the catch basins, had storm lead come out and vac out both catch basins and cleaned up mess on street.	I

APPENDIX G

- **GENERAL AWARENESS EFFORTS**
  - **Stormwater Survey**
  - **Survey Results**
  - **Social Media Campaign**
- **STEWARDSHIP OPPORTUNITIES**

CITY OF ORTING Annual Report Question Q.21

Attach a description of general awareness efforts conducted, including your target audiences and subject areas, **per S5.C.2.**

Orting's stormwater public education and outreach program attempt to build awareness that will ultimately reduce pollutants in stormwater and improve water quality in waters of the state. The program focuses on providing resources for information, services, and activities that may help people in the community to better understand stormwater best management practices. The city hopes that more knowledge and engagement of the community will adopt attitudes and behaviors that can decrease damaging effects stormwater.

The program is organized to follow and address minimum performance measures outlined in permit subsection S5.C.2.

- Build general awareness about methods to address and reduce impact from stormwater runoff.
- Effect behavior change to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.
- Create stewardship opportunities that encourages community engagement in addressing the impacts from stormwater runoff.

S5.C.2.a.i – Build General Awareness

It's the City's goal to continue improving awareness and involvement in stormwater management with the general public, including businesses, engineers, contractors, developers, land use planners, residents and property owners. The City refers to regional resources and local opportunities for education and stewardship for these target audiences.

S5.C.2.a.i.a – Build General Awareness with the General Public and Businesses

The following measures supports building general awareness with the general public and businesses in the following subject areas outline in the permit:

4) General impacts of stormwater on surface waters
5) Impacts from impervious surfaces
6) Low impact development (LID) principles and LID best management practices (BMPs)

The City achieves compliance with these subject areas by making available and advertising publicly the services, activities, and publications listed below:

- City of Orting 2020 Stormwater Management Program Plan
- City of Orting Shoreline Master Program
- City of Orting website: www.cityoforting.org
- Jurisdiction Partner with Pierce Conservation District www.piercecd.org
- Personal interactions via phone, in person, or email
- Environmental compliance inspections
- Source control inspections
- Fats, Oil and Great (FOG) inspections
- Hazardous Waste Facility inspections

- Response to private drainage concerns
- Operations and Maintenance activities
- Public Works Committee Monthly Meeting
- Annual direct mailings
- Public land use notices
- City Council and committee meetings
- Educational brochures
- Only Rain Down the Drain storm drain markers
- Enviroscape presentations at city events

S5.C.2.a.i.b – Build General Awareness with Engineers, Contractors, Developers and Land Use Planners

The city continues to build general awareness with engineers, contractors, developers and land use planners in the three following subject areas in the permit:

4) Technical standards for stormwater sites and erosion control plans
5) LID Principles and LID BMPs
6) Stormwater treatment and flow control BMPs/facilities

The City achieves compliance with these subject areas by making available and advertising publicly the services, activities, and publications listed below:

- City of Orting 2020 Stormwater Management Program Plan
- City of Orting Shoreline Master Program
- City of Orting Design and Construction Standards
- City of Website: www.cityoforting.org
- Personal interactions via phone, in person or email
- Annual direct mailings
- Environmental compliance inspections
- Source control inspections
- Orting Building Department
- Development Reviews
- Pre and post construction meetings
- Construction inspections
- Building inspections
- Erosion and sediment control inspections
- Certified Erosion and Sediment Control Lead (CESCL) training
- Professional conferences
- WA DOE LID training opportunities

2023 Social Media Results				
Topic	**Media Type**	**Website**	**Social Media**	**Number of Likes/Shares**
Salt on sidewalks	PDF		X	0/1
EPA TIP SHEET - AUTO SHOPS	PDF			0/0
NPDES Annual Report	PDF	X		0/0
Be Stormwater Smart	PDF		X	0/0
EPA TIP Sheet - Cigaretts	PDF		X	5/0
Living in Wetlands	PDF		X	1/1
EPA TIP SHEET - PARKING LOTS	PDF			0/0
The scoop on Stormwater	YouTube Video		X	0/1
Pet Waste can pollute waterways	PDF			1/0
Rain Garden Information for Non-Professionals	LID Class flyer		X	2/1
Demo-Oil Spill Cleanup	YouTube Video		X	0/1
EPA TIP SHEET - LAWN CARE	PDF			1/0
Only Rain down The Drain	PDF		X	0/1
EPA TIP SHEET - GARBAGE	PDF			0/0
Pollution Solutions	YouTube Video		X	1/1
EPA TIP SHEET - OIL AND GREASE	PDF			0/0
Stormwater Management & Awareness	PDF		X	0/2
PSSH--Caring for your car	YouTube Video		X	3/0
PSSH--Water Quality	YouTube Video		X	9/0
Know what happens when it rains	PDF		X	

S5.C.2.a.ii(c): In 2020, the City sent out a City wide survey. The results from that survey determined a target audience and BMP. For the most part, it would appear that residential homeowners were interested in use and storage of automotive chemicals and cleaning supplies. With this in mind, a social media campaign was started in May thru Sept of 2021 - 2023 to assist residents on 'caring for your car' & impacts. Several YouTube Videos were posted and monitored for likes/shares. Though we are confident the videos posted were viewed, we were disappointed to find not many indicators for likes or shares. Those numbers are posted in the chart above. In addition to this campaign, the City also attends the local Farmers Market, June thru Aug, and provides information packets about all the topics listed above and more.

Topic	Media type	Website	Social Media	Mail city wide
Flood Information Center	Website	X	X	
Emergency Preparedeness Info	PDF		X	
Flood Plain Outreach Letter	PDF			X
Stormwater Management & Awareness	PDF		X	
Flood Insurance & Flood Map Information	PDF		X	
Flood Smart	PDF		X	
Flood Safety Checklist	PDF		X	
Are you prepared for a Power Outage	PDF		X	
Using your smart phone in an Emergency	PDF		X	

CITY OF ORTING Annual Report Question #26a

S5.C.2.a.iii – Promoted stewardship opportunities (or partnered with others) to encourage resident participation in activities such as those described in S5.C.2.a.iii

The city encourages stormwater stewardship and works to provides opportunities through local and regional programs. Some opportunities include:

- Only Rain Down the Drain storm drain markers: About 90% of the cities storm drains are marked with drain markers
- Scoop the poop: All City owned parks and major trail within city limits now has Dog Waste Station Refill Bags
- Natural Yard Care: Information provided at City sponsored events, city website and social media
- River Levee clean-up program
- Rain Barrel Classes: The City has sponsored 4 classes in the last 7 years
- Annual Recycling and hazardous waste collection events: The City work in cooperation with local refuse company for annual recycling and waste collection events held each spring and fall.

APPENDIX H

City of Orting Annual Report Q.30a – Outfall Inventory

S5.C.4 List of known outfalls' size & material

List #	Outfall Location	Size	Material	
1	Village Crest	18"	Concrete	
2	High School	30"	Concrete	
3	River Ave	30"	Concrete	
4	Village Green/High Cedars	18"	CPEP	
5	Gratzer Park	36"	SRPE	
6	Village Green	36"	SRPE	Dual

APPENDIX H

➢ SOURCE CONTROL INVENTORY

➢ SOURCE CONTROL INSPECTION PLAN

City of Orting Annual Report Question Q.78 – Source Control Inspections

S5.C.8 List of Inspections, per S5.C.8.b.iii, organized by the business category, noting the amount of times each was inspected, and if enforcement actions were taken.

2023 Source Control Inspections

Due to the amount of information recorded for each inspection record, the below columns will not be spedific. Attached is an example of a complete inspection record.

INS#	ADDRESS	Asset ID	Descript	Discharge to MS4	Flow Control BM	Drainage Basin ID	Receiving Water	Departme	AssignedT	Type	Comments	Type of Visit	Inspection Dat	Inside Activitie	Outdoor Storage Activites	Spill Prep	Documents/training
SCI1011	533 HARMAN WAY S	SC0024	SOURCE CONTROL	Yes	Oil-water Separator	SWIN_265	Puyallup river	STORM	NOLAN	Food & Drink Service	The outcome of the inspection found that there are three catch basins within the parking lot that flow to a three walled separator. With all three, the top of the floor is flush with the invert of the pipes. There is no space to allow sediment to be contained and will continue to flow directly into the separator. The best example of this is the first photo in the attachment section of this inspection.	Initial	9/28/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1018	301 HARMAN WAY S	SC0030	SOURCE CONTROL	Yes	Oil-water Separator		Puyallup river	STORM	NOLAN	Coffee shop	None	Initial	10/3/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1021	112 Bridge St S	SC0005	SOURCE CONTROL	Yes	discharge to surface water	SwIN_1147	Puyallup river	STORM	NOLAN	Eagles Hall	None	Initial	10/3/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1008	111 Bridge St S	SC0023	SOURCE CONTROL	Yes	Discharge to MS4	SwIN_144,145	Puyallup river	STORM	NOLAN	Auto Repair	None	Initial	9/28/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1019	228 Washington Ave S	SC0014	SOURCE CONTROL	Yes	Discharge to MS4	SwIN_1186, 1189, 1190	Carbon River	STORM	NOLAN	Restaurant	None	Initial	10/3/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1027	212 Washington Ave S	SC0013	SOURCE CONTROL	Yes	Discharge to MS4	SwIN_1191	Carbon River	STORM	NOLAN	Bakery	None	Initial	10/6/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1034	120 Washington Ave S	SC1012	SOURCE CONTROL	Yes	Discharge to MS4	SwIN_242,241	Carbon River	STORM	NOLAN	Food & Drink Service	None	Initial	10/10/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1022	114 Washington Ave S	SC0011	SOURCE CONTROL	Yes	Discharge to MS4	SwIN_242, SwIN_241	Carbon River	STORM	NOLAN	Restaurant	None	Initial	10/3/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1030	101 Calistoga St E	SC0017	SOURCE CONTROL	Yes	Discharge to MS4	SwIN_238, 247, 1198	Carbon River	STORM	NOLAN	Restaurant	None	Initial	10/6/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1017	201 CalistogaSt W	SC0016	SOURCE CONTROL	Yes	Discharge to MS4	SwIN_118,120,121,218,219,220,1185	Puyallup river	STORM	NOLAN	Hardware	None	Initial	1/3/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1004	204 Washington Ave N	SC0020	SOURCE CONTROL	Yes	Discharge to MS4	SwIN_1204, SwIN_1107, SwIN_415	Carbon River	STORM	Miller	Fuel Station & Food Mart	Catch basins in parking lot need to be pumped and cleaned.	Initial	9/28/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1036	201 Washington Ave N	SC0033	SOURCE CONTROL	Yes	discharge to surface water		Puyallup river	STORM	NOLAN	Restaurant	None	Initial	10/11/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1014	211 Washington Ave N #A101	SC0002	SOURCE CONTROL	Yes	Discharge to MS4	SwIN_1104	Puyallup river	STORM	NOLAN	Restaurant	None	Initial	9/28/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1013	211 Washington Ave N #A103	SC0029	SOURCE CONTROL	Yes	Discharge to MS4	SwIN_1104	Puyallup river	STORM	NOLAN	Restaurant	None	Initial	9/28/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1012	211 Washington Ave N #A104	SC0001	SOURCE CONTROL	Yes	Discharge to MS4	SwIN_1104	Puyallup river	STORM	NOLAN	Restaurant	None	Initial	9/28/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1003	221 Washington Ave N	SC0021	SOURCE CONTROL	Yes	Discharge to MS4	SwMH_240, SwIN_259, SwIN_1103	Puyallup river	STORM	NOLAN	Fuel Station & Food Mart	Def fluid packaged for sale, refrigerators for beverage sale	Initial	9/28/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1029	320 Washington Ave N	SC0022	SOURCE CONTROL	Yes	Discharge to MS4, Discharge to Surface Water	SwIN_261,1209, 1208, 1207	Carbon River	STORM	NOLAN	School Bus Barn	Bus washing area is not set up to properly contain and dispose of wash water.	Initial	10/6/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1002	215 Whitesell St NW	SC0009	SOURCE CONTROL	Yes	Discharge to MS4, Oil-water Seperator, Detention Vault	SwIN_1098, SwIN_224, 225, 226	Puyallup river	STORM	NOLAN	Fuel Station	Def fluid packaged for sale, refrigerators for beverage sale	Initial	10/11/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1007	215 Whitesell St NW	SC0028	SOURCE CONTROL	Yes	Discharge to MS4	SwIN_ 1098, 224, 225, 226, 358	Puyallup river	STORM	NOLAN	Restaurant	None	Initial	9/28/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1023	215 Whitesell St NW	SC0003	SOURCE CONTROL	Yes	Discharge to MS4	SwIN_ 1098, 224, 225, 226, 358	Puyallup river	STORM	NOLAN	Restaurant	None	Initial	10/3/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1006	215 Whitesell St NW, B112	SC0004	SOURCE CONTROL	Yes	Discharge to MS4	SwIN_ 1098, 224, 225, 226, 358	Puyallup river	STORM	NOLAN	Restaurant	None	Initial	9/29/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1025	321 Washington Ave NW	SC0019	SOURCE CONTROL	Yes	Discharge to MS4, Oil-water Seperator	SwIN_1098, SwIN_226, 225, 224	Puyallup river	STORM	NOLAN	Restaurant	Dumpster area has buildup of greases and debris surrounding drain. It is unclear where drain flows to. No information for it in build plans. Manager explained insert for drain is replaced quarterly. Area needs to be more closely monitored and cleaned	Initial	10/3/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1026	409 Washington Ave NW	SC0031	SOURCE CONTROL	Yes	discharge to surface water, Infiltration/LID BMPs		Puyallup river	STORM	NOLAN	Coffee shop	None	Initial	10/3/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1028	101 Williams Blvd NE	SC0006	SOURCE CONTROL	Yes	Discharge to MS4, Discharge to Surface Water	SwIN_653, 327, 685	Carbon River	STORM	NOLAN	City Water Source	None	Initial	10/6/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1031	902 Rocky Rd NE	SC0027	SOURCE CONTROL	Yes	Discharge to MS4	SwIN_12,18, SwMH_353	Carbon River	STORM	NOLAN	City WWTP		Initial	10/6/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1032	900 Rocky Rd NE	SC0018	SOURCE CONTROL	Yes	Discharge to Surface Water		Carbon River	STORM	NOLAN	City Public Works facility	None	Initial	10/6/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1033	900 Rocky Rd NE	SC0026	SOURCE CONTROL	Yes	Discharge to Surface Water		Carbon River	STORM	NOLAN	City Water Source	None	Initial	10/6/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1015	14604 149th St Ct E	SC0032	SOURCE CONTROL	Yes	Discharge to MS4, Wet Pond		Puyallup river	STORM	NOLAN	Restaurant	None	Initial	9/29/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1035	18711 Wa-162	SC0034	SOURCE CONTROL	Yes	Discharge to Surface Water, Detention Pond		Carbon River	STORM	NOLAN	City Water Source	None	Initial	10/10/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1010	22322 Fisk Rd	SC0007	SOURCE CONTROL	Yes	Discharge to Surface Water		Puyallup river	STORM	NOLAN	City Water Source	None	Initial	9/29/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record
SCI1016	22806 177th St E	SC0008	SOURCE CONTROL	Yes	Discharge to Surface Water		Carbon River	STORM	NOLAN	City Water Source	None	Initial	9/29/2023	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record	Documented in Inspection Record

APPENDIX I
SOURCE CONTROL INSPECTION PLAN

Source Control (Business/Site) Inspection program

Q.79 S5.C.8 Implemented an ongoing source control training program per S5.C.8.b.v

The National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater permit requires Source Control inspections for Businesses and sites. This document includes recommended equipment and materials, guidance for inspectors and well as specific guidance on pre-inspection activities, business/site inspection activities.

S5.C.8.a.i The Permittee shall implement a program to prevent and reduce pollutants in runoff from areas that discharge to the MS4. The program shall include: (1) Application of operational source control BMPs; and if necessary, structural resource control BMPs or treatment BMPs/facilities, or both, to pollution generating sources associated with existing land uses and activities.

The NPDES Municipal Stormwater Permit specified the focus of the inspections, the standards to be achieved by the inspections, and the inspection approach. The focus of the inspection is compliance with the proper application and maintenance of operational and structural source control best management practices (BMPs) (Western Washington 2019-2024 Phase II Permit, S5.C.8.a.i).

Equipment and materials

The equipment and material needed for conducting an inspection will vary based on the information gathered during the inspection and the type of business/site that will be inspected. The inspector should be prepared with the appropriate documents, field equipment, and safety equipment. Recommended equipment and materials for business/site inspections are listed in Table 5.1.

Documents	Inspection Equipment	Safety Equipment
• Business Cards • Outreach Materials • Site plans & maps • Tablet or clipboard for record keeping • Owner/site manager contact information	• Camera for taking pictures • Flashlights or high-powered lamps • Manhole cover hook or lid lifter • Metals probing rod • Various wrenches • Shovel or rake • Optional items: sample bottles, chemical test strips, fluorescent dye	• Hard hat • Steel toe boots • ANSI 107-1099 labeled safety vest • Safety glasses • Leather or heavy cloth gloves • Latex gloves • Hearing protection (depending on site activities)

Guidance for Inspectors

The inspection program for meeting NPDES Municipal Stormwater Permit requirements, understand the programs focus on an education and technical level. Identify progressive enforcement options that are available to bring deficiencies into compliance when appropriate. Implementation of source control BMPs may be a new concept for most business/sites and patience during the inspection and follow-up process will help to generate support for inspectors and the inspection program and ultimately the jurisdiction implementing the program.

Inspection Process

The inspection process in separated into three phases:

1. Pre-inspection activities (investigation and data gathering)
2. Business/site inspection and documentation
3. Follow-up activities

Pre-Inspection Activities:

- Determine if an appointment is needed
- Verify business/site contact information
- Research and understand the business type and potential pollutant generating sources
- Review records from previous inspections
- Review the onsite drainage as-builts
- **Review information about potential Source Control BMPs**
- **Prepare inspection form**

Business/Site Inspection and documentation:

- **Introduction and explanation of inspections purpose**
- Identify the appropriate business/site contact
- **Conduct the site walk-through**
- Documentation inspection
- Verify contact information
- Close the inspection

Follow-up Activities:

- **Enter or verify the business/site inspection information in the data management system**
- Summary communication of inspection results
- Generate business/site letter/e-mail documenting deficiencies (if needed)
- Enter appropriate reminders for conducting follow-up inspections (fi needed)
- Begin the process for immediate enforcement (if required)

- **Review information about potential source control BMPs** that may be encountered based upon the business type specific for the potential pollutant generating sources at the site.

  Prepare a hard copy binder with source control BMP requirements from the 2019 SWMMWW or functionally equivalent manual BMP fact sheets, and/or other educational materials that clearly convey source control BMP requirements. The binder does not need to be comprehensive, but having this information prepared for common source control NMPs may be helpful when conducting an inspection.

- **Prepare Inspection Form**. The City of Orting's Source Control Inspection form can be found in the Asset Management/Work Order System. By accessing the Stormwater Layer in GIS and selecting SC Inspection layer. Identify the Business and select the asset (CB/MH) nearest the asset and then select the SC Form under the asset's information.

- **Introduction and explanation of inspection purpose is important**. Provide your business card to the site manager and explain the purpose of the inspection. Explain the inspection process, document, review and note observations & possible deficiencies.

- **Conduct the site walk-through**. The goal of the inspection is to determine compliance and deficiencies with source control. Ask questions about the business processes as each area is inspected to learn how the activity is managed. Ask the site manager/owner to walk through the business/site the same way that products and services would

Area or Activity	Common Source Control BMPs
Outdoor storage areas	• Raw materials, by-products, and finished products are covered • Raw materials, by-products, and finished products are located away from storm drains • Chemicals, drums, and bagged materials are stored off the ground • Drip pans or containers are used where leaks could occur • Storage area are designed to prevent stormwater runoff or run-on
Waste handling and disposal	• Waste dumpsters are closed and not leaking • Grease containers are closed, not leaking, no drips or spills on the ground • Mats and racks are cleaned in locations that are not directed to the storm drainage system
Hazardous Wastes	• Materials are labeled, covered, and stored in secondary containment • Secondary containment is free from spills and water exposure • Waste disposal records are kept up to date • Universal waste is properly stored and disposed
Fueling Areas	• Fueling areas are covered and on a concrete surface • Fueling areas are have no stormwater runoff or run-on • Spill response kit(s) are readily accessible • Above ground tanks are double-walled or have secondary containment
Equipment and vehicle washing and repair	• Vehicles are washed at a designated wash rack area with disposal to the sanitary sewer system • Non-operational vehicles and equipment are drained of fluid and/or drips are controlled.
Loading/unloading area	• Areas are managed to reduce exposure to rain • Storm drains are covered during material transfer
Outdoor work activities	• Track out of materials is controlled • Work is conducted within contained or covered areas as necessary

Spill plan	• Spill plan is posted in a visible area and employees are aware of location
Spill Kit	• Spill kit(s) are properly stocked • Spill kit location(s) are marked on am ap contained in the spill plan
Building Exterior and grounds	• Dry methods are used to clear litter and debris • Pressure washing water is collected and disposed properly • Parking and driveway areas are relatively free of staining • The site is free of litter and debris
Storm drainage systems	• Catch basins, on-site stormwater management/flow control/runoff treatment BMPs/facilities are maintained according to standards • Catch basins/manholes are labeled
Illicit connections	• Indoor drains are connected to the sanitary sewer system or an on-site septic system

When an inspection is complete, verify all information is accurate and entered in the Asset Management/Work Order System. The outcome of the inspection will determine if follow-up action will be required. Will environmental concerns need to be reported to any state agency; remind site owner that you can provide additional assistance if needed.

Timeline: The NPDES report does not specify timelines for source control compliance. If an illicit connection is identified, the NPDES Municipal Stormwater permit has establish a timeline for compliance in the 2019-2024 WW Phase II Permit S5.C.8.a.i.