

2019  
STORMWATER MANAGEMENT PROGRAM  
PLAN

CITY OF RENTON MUNICIPAL STORMWATER PROGRAM



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City of Renton  
1055 South Grady Way  
Renton, Washington 98057

March 15, 2019

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# INTRODUCTION AND BACKGROUND

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

Discharges from MS4s (systems designed to collect and convey stormwater runoff) are regulated by Ecology under the NPDES program. The municipal NPDES permit seeks to control or reduce pollutant discharge to the maximum extent practicable, primarily through programmatic efforts. The city is regulated by Ecology as a Phase II permittee. The first Phase II Permit became effective on February 16, 2007, was modified in 2009, and expired on February 15, 2012. Ecology extended the 2007-2012 Phase II Permit requirements until July 2013. The second Phase II Permit was issued on August 1, 2012 and became effective on August 1, 2013. Ecology extended the 2013-2018 Phase II Permit requirements until July 2019. All 2013-2018 Phase II Permit requirements described in this plan were completed by their respective deadlines. The new 2019-2024 permit with updated requirements is planned to be issued on July 1, 2019 with an effective date of August 1, 2019. For fiscal year 2019 (July 1, 2018 through June 30, 2019), the city was charged an annual permit fee of \$62,280 by Ecology. This annual fee will likely increase with future Phase II Permit updates. This document assumes that the Draft Western Washington Phase II Municipal Stormwater Permit will be issued as written, but it may be amended if the Permit requirements change.

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

1. A comprehensive stormwater planning program to inform and assist in the development of policies and strategies to protect aquatic resources
2. A public education and outreach program designed to build general awareness about methods to address stormwater impacts, effect behavior change to reduce behaviors that lead to adverse stormwater impacts, and create stewardship opportunities that encourage the community to address stormwater impacts
3. A public involvement and participation program to provide opportunities for the public to get involved in the development, implementation, and update of the SWMP
4. An ongoing mapping and documentation program to map and document the MS4

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

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

# COMPREHENSIVE STORMWATER PLANNING

The city plans to implement the comprehensive stormwater planning requirements starting on August 1, 2019 as there are no requirements under the 2013-2018 Phase II Permit. This section describes the Phase II Permit requirements related to comprehensive stormwater planning, including planned activities.

## 2019–2024 Phase II Permit Requirements

Section S5.C.1 of the 2019-2024 Phase II Permit requires the city to implement comprehensive stormwater planning program to develop water quality management policies and strategies protective of aquatic resources and to convene an interdisciplinary team to inform in the development, progress, and influence of the program. The specific Phase II Permit requirements are as follows:

1. Report on how stormwater management needs and receiving water protection/improvement inform the long-range planning update process and influence policies and implementation strategies. By **March 31, 2020** and **March 31, 2022**, under the 2013-2018 Phase II Permit cycle and 2019-2024 Phase II Permit cycle, respectively, describe how the Comprehensive Plan and other long-range land use plans addressed water quality and watershed protection.
2. Annually assess and report newly identified administrative or regulatory barriers to implementation of low impact development (LID) principles or low impact development best management practices (LID BMPs). Report on measures to address barriers since local codes were adopted in 2016, and mechanisms to encourage or require LID implementation.
3. Implement stormwater management action planning:
  - a. Review existing information to assess local receiving water bodies and contributing basin conditions.
  - b. By **June 30, 2022**, develop a prioritization method and process to identify and rank receiving water bodies for stormwater facility retrofits and management actions. Document a process and schedule to assess and improve the planning and implementation of procedures or projects.
  - c. By **December 31, 2022**, develop a Stormwater Management Action Plan (SMAP) for at least one high priority area.

## Planned and Recommended Activities

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

<b>Table 1-1. Planned Comprehensive Stormwater Planning Activities.</b>			
<b>Activity</b>	<b>Tasks</b>	<b>Lead</b>	<b>Proposed Schedule or Frequency</b>
Long-range plan update for 2013-2018 permit	Describe how water quality and watershed protection is addressed in the Comprehensive Plan during the 2013-2018 permit term.	Community and Economic Development (CED) Long Range Planning, Surface Water Utility (SWU) Engineering, Transportation Planning	March 31, 2020
Long-range plan update for 2019-2024 permit	Describe how water quality and watershed protection is addressed in the Comprehensive Plan during the 2019-2024 permit term.	CED Long Range Planning, SWU Engineering, Transportation Planning	March 31, 2022
Assess LID implementation	Annually report on barriers and measures to address them in implementing LID principles and LID BMPs	CED Long Range Planning, CED Planning, SWU Engineering	December 31, 2019
Receiving water basin assessment	Assess local receiving waters and contributing basin information.	SWU Engineering, Surface Water (SW) Maintenance	Ongoing
Receiving water basin prioritization	Develop and follow a prioritization method and process.	SWU Engineering, SW Maintenance	June 30, 2022
Stormwater Management Action Plan	Develop a Stormwater Management Action Plan (SMAP).	SWU Engineering, SW Maintenance	December 31, 2022

# PUBLIC EDUCATION AND OUTREACH

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

## 2013–2018 Phase II Permit Requirements

Section S5.C.1 of the 2013-2018 Phase II Permit requires the city to develop and implement a public education and outreach program. Education and outreach efforts shall be prioritized in the following areas:

1. Provide an education and outreach program to build general awareness, and effect behavioral change, that selects from the following target audiences:
  - a. General public (including school age children)
  - b. Engineers, contractors, developers, and land-use planners
  - c. Businesses (including home-based and mobile businesses)
  - d. Residents, landscapers, and property managers/owners
2. Create stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities such as storm drain marking, volunteer monitoring, riparian plantings and education activities.
3. Measure the understanding and adoption of the targeted behaviors for at least one target audience in at least one subject area.
4. Use results to direct education and outreach resources most effectively (no later than **February 2, 2016**) as well as to evaluate changes in adoption of targeted behaviors.

## 2019–2024 Phase II Permit Requirements

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

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

Subject areas:

- General impacts of stormwater on surface waters, including impacts from impervious surfaces
  - Low impact development (LID) principles and LID BMPs
- b. Engineers, contractors, developers, or land-use planners

Subject areas:

- Technical standards for stormwater site and erosion control plans
  - LID principles
  - Permanent stormwater facilities and LID BMPs
2. Effect behavior change that selects at least one target audience and one BMP from the following:
- a. Residents, landscapers, property managers/owners, developers, school age children, or businesses (including home-based or mobile businesses)

BMPs:

- Use and storage of: pesticides, fertilizers, and/or other household chemicals
- Use and storage of automotive chemicals, hazardous cleaning supplies, carwash soaps, and/or other hazardous materials
- Prevention of illicit discharges
- Yard care techniques protective of water quality
- Carpet cleaning
- Repair and maintenance
- BMPs for: vehicles, equipment, and/or home buildings
- Pet waste management and disposal
- LID principles and LID BMPs
- Stormwater facility maintenance, including LID facilities
- Dumpster and trash compactor maintenance
- Litter and debris prevention
- Sediment and erosion control
- (Audience specific) Source control BMPs

- (Audience specific) Locally-important, municipal stormwater-related subject area
- b. By **July 1, 2020**, conduct an evaluation of the effectiveness of an ongoing behavior change program with lesson learned and recommendations for changing the program.
  - c. Based on the evaluation, by **February 1, 2021**, use social marketing methods to develop a program tailored to the community, including an evaluation plan, strategy and schedule.
  - d. By **April 1, 2021**, begin to implement the developed strategy.
  - e. By **March 31, 2024**, evaluate and report on changes in understanding and adopted behaviors resulting from the implemented strategy and on planned or recommended changes to the program to improve efficacy.
  - f. Use the evaluation results to continue to direct effective methods and implementation of the ongoing behavior change program.
3. Create and advertise stewardship opportunities and/or partner with existing organizations to encourage residents to participate in activities or events such as storm drain marking, volunteer monitoring, riparian plantings and education activities.

## Planned and Recommended Activities

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

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

<b>Activity</b>	<b>Tasks</b>	<b>Lead</b>	<b>Proposed Schedule or Frequency</b>
Solid waste events and social media outreach	Provide education on natural yard care, hazardous waste management, waste prevention and pet waste disposal.	Solid Waste Section	Ongoing
Recycling events	Coordinate two collection events for household hazardous wastes such as oil, antifreeze, oil filters, and batteries.	Solid Waste Section	May and September 2019
Multifamily outreach	Provide waste prevention resources to multifamily residences.	Solid Waste Section	Ongoing
Partner with Local Hazardous Waste Management Program	Partner with local jurisdictions to provide outreach for proper handling and storage of hazardous materials and opportunities for their disposal.	Solid Waste Section	Ongoing
Aquifer Model	Provide water quality and conservation education at public events.	Water Utility Engineering	Ongoing
Nature Vision Classroom Programs	Provide funding through the Saving Water Partnership to conduct watershed science classes at elementary schools.	Water Utility Engineering	Ongoing
Business education and outreach <sup>a</sup>	Partner with ECOSS to provide spill kits and spill response education/training to restaurants.	Surface Water Utility (SWU) Engineering	December 31, 2019
Participate in STORM ( <i>Stormwater Outreach for Regional Municipalities</i> )	Participate in STORM program and promote the Puget Sound Starts Here campaign messaging.	SWU Engineering	Ongoing
Volunteer Storm Drain Marker Program	Coordinate citizen volunteers to mark stormwater drains.	SWU Engineering	Ongoing
WRIA 8 and WRIA 9	Partner with WRIA 8 Salmon Recovery Council and WRIA 9 Watershed Ecosystem Forum.	SWU Engineering	Ongoing
Community stewardship events	Coordinate community events to plant trees at city parks.	Parks Planning & Natural Res.	April 27, 2019
Street Tree Replacement	Provide tree care instructions to street tree recipients.	Parks Planning & Natural Res.	Ongoing
Volunteer riparian tree planting	Coordinate volunteer events to plant trees in riparian areas	Parks & Trails	Ongoing
Chinook Book Campaign	Provide discounts to community members in exchange for a pledge.	SWU Engineering	Ongoing



<sup>a</sup> This planned public education and outreach activity also can be used to meet S5.C.3.c.iv - informing public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.

**Table 2-2. Recommended Public Education and Outreach Activities.**

Activity	Tasks	Lead	Proposed Schedule or Frequency
Expand educational materials available through existing programs and streamline stormwater outreach messaging and public handouts	Integrate stormwater public education and outreach into existing Public Works programs. Develop consistent stormwater outreach messaging among various city departments. Combine handouts based on target audiences and eliminate handouts with redundant information.	SWU Engineering	TBD
Car wash outreach	Provide outreach to groups holding charity car wash events.	SWU Engineering	TBD
King Conservation District Classroom Programs	Partner with KCD to provide stormwater classes in elementary schools.	SWU Engineering	TBD
Aquifer Protection Program	Provide education on proper chemical storage to businesses in aquifer protection zones.	Water Utility Engineering	TBD
Natural Yard Care Program	Provide classes that teach yard care strategies to eliminate reliance on pesticides, herbicides and chemical fertilizers.	SWU Engineering	TBD
Promote community stewardship	Encourage community involvement with stream teams, volunteer monitoring, riparian planting or education activities.	SWU Engineering	TBD
Expand Adopt a Neighborhood Program	Evaluate the addition of a stormwater BMP component to the city’s Adopt a Neighborhood Program.	SWU Engineering	TBD
Add a stormwater component to the Citizen’s Academy <sup>a</sup>	Consider adding a surface water/storm component to the “Citizen’s Academy” that emphasizes IDDE topics and maintenance.	SWU Engineering, Citizen’s Academy	TBD
Develop and circulate new public education materials <sup>b</sup>	Develop an illicit discharge handout, mailing handouts to single-family residences, and provide relevant handouts at pre-application meetings.	SWU Engineering	TBD
Illicit discharge education and outreach <sup>b</sup>	Consider developing a brochure or handout to provide to companies that respond to spills associated with automobile accidents.	Interdepartmental Team	TBD

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

- <sup>a</sup> Citizen's Academy is a city program designed to education city residents and business owners in how the Public Works Department operates.
- <sup>b</sup> This planned public education and outreach activity also can be used to meet S5.C.3.c.iv - informing public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.

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# PUBLIC INVOLVEMENT AND PARTICIPATION

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

## 2013–2018 and 2019-2024 Phase II Permit Requirements

Section S5.C.2 of the 2013-2018 Phase II Permit and Section S5.C.3 of the 2019-2024 Phase II Permit require that the city create opportunities for the public to participate in the decision-making processes involving the development, implementation, and update of the SWMP, and comply with applicable state and local public notice requirements. The two main components include:

1. Developing and implementing a process for consideration of public comments on the city’s SWMP
2. Posting the Annual Report and the SWMP Plan, on the city’s website no later than May 31 of each year.

## Planned Activities

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

<b>Activity</b>	<b>Tasks</b>	<b>Lead</b>	<b>Proposed Schedule or Frequency</b>
Revise SWMP Plan	Update SWMP Plan with planned activities for 2019.	SWU Engineering	Update SWMP Plan in first quarter of 2019; post on city’s website by May 31, 2019
Prepare and submit Annual Report to Ecology	Prepare and submit Annual Report including SWMP Plan and other supplemental documentation (as applicable).	SWU Engineering	March 31, 2019
Public involvement in the SWMP	Solicit feedback on website.	SWU Engineering	Ongoing

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# MS4 MAPPING AND DOCUMENTATION

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

<http://rp.rentonwa.gov/Html5Public/Index.html?viewer=CORMaps>. This section describes the MS4 Mapping and Documentation Phase II Permit requirements, as well as the city's planned compliance activities for the 2019-2024 Phase II Permit cycle. The requirements and planned activities under the 2013-2018 Phase II Permit are described in the Illicit Discharge Detection and Elimination section.

## 2019–2024 Phase II Permit Requirements

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

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

## Planned Activities

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

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



# ILLICIT DISCHARGE DETECTION AND ELIMINATION

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

## 2013–2018 Phase II Permit Requirements

Section S5.C.3 of the 2013-2018 Phase II Permit requires the city to include an ongoing IDDE Program designed to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the stormwater system. The specific Phase II Permit requirements are as follows:

1. Continuing mapping of the MS4 on an ongoing basis.
2. Publicize a public hotline number for reporting of spills and other illicit discharges; and track all calls and follow-up actions taken.
3. By **February 2, 2018**, adopt an updated ordinance that effectively prohibits non-stormwater, illegal discharges, or dumping into the city's stormwater system to the maximum extent allowable by state and federal law.
4. By **December 31, 2017**, complete field screening of 40 percent of the stormwater system. After **December 31, 2017**, the city is required to complete field screening on an average of 12 percent of the stormwater system per year.
5. Implement an ongoing program designed to address illicit discharges, including spills and illicit connections, which includes procedures for characterizing the nature and potential threats of an illicit discharge, procedures for tracing the source of an illicit discharge, and procedures for eliminating the discharge.
6. Implement an ongoing IDDE staff training program.
7. Distribute information to public employees, businesses, and the general public of the hazards associated with illicit discharges and improper disposal of wastes.

## 2019–2024 Phase II Permit Requirements

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

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

## Planned Activities

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

<b>Table 5-1. Planned Illicit Discharge Detection and Elimination Activities.</b>			
<b>Activity</b>	<b>Tasks</b>	<b>Lead</b>	<b>Proposed Schedule or Frequency</b>
Coordination with adjoining MS4	Develop and implement procedures to address pollutants from adjoining MS4s.	SWU Engineering, SW Maintenance	August 1, 2019
Illicit Discharge Program Plan implementation	Implement Illicit Discharge Program plan requirements to report and address illicit discharges and illicit connections. Implement procedures in the Spill Response Standard Operating Procedures Manual.	SWU Engineering, CED Development Engineering, CED Construction Inspectors, CED Building Inspectors, CED Code Compliance, Parks & Trails, Golf Course, Airport, Public Works Maintenance	Ongoing
Business education and outreach	Partner with ECOSS to provide spill kits and spill response education/ training for restaurants.	SWU Engineering	December 31, 2019
Illicit discharge ordinance	Evaluate existing ordinance effectiveness in prohibiting illicit discharges.	SWU Engineering, SW Maintenance, CED Code Compliance	Ongoing
Illicit discharge and illicit connection field screening	Implement a field screening methodology (or methodologies) to meet the field screening requirement.	SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	Field screen 12% of the storm system on average by December 31, 2019. Track total percentage starting August 1, 2019.
Spill hotline	Publicize the spill hotline	SWU Engineering	Ongoing
Staff training	Training on IDDE general awareness and IDDE response.	Interdepartmental Team	Ongoing
Staff training	Training on IDDE investigation, termination, cleanup and reporting.	SWU Engineering, SW Maintenance	Ongoing
Record keeping	Utilize Cityworks to record IDDE activities.	SWU Engineering, SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	Record per Ecology format starting August 1, 2019.

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

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

## 2013–2018 Phase II Permit Requirements

Section S5.C.4 of the 2013-2018 Phase II Permit requires that the city develop and implement a program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction activities. The specific Phase II Permit requirements are as follows:

1. Implement an ordinance or ordinance revision that addresses runoff from new development, redevelopment, and construction sites and adopt Ecology’s *Stormwater Management Manual for Western Washington*, or equivalent, by **December 31, 2016**. Include provisions to verify adequate long-term operation and maintenance (O&M) of stormwater treatment and flow control BMPs/facilities.
2. Review all stormwater site plans for proposed development activities.
3. Conduct inspections of construction sites prior to clearing and construction, during construction, and upon completion of construction.
4. Conduct annual inspections of all stormwater treatment and flow control BMPs/facilities that discharge to the stormwater system and were permitted by the city since 2010 (unless maintenance records justify a reduced inspection frequency).
5. Ongoing training program for staff responsible for implementing the program to control stormwater runoff from new development, redevelopment, and construction sites.
6. Review, revise, and make effective local development-related codes, rules, standards, or other enforceable documents to incorporate and require LID principles and LID BMPs by **December 31, 2016**. Submit a summary of the results of the review and revision process with the annual report due no later than **March 31, 2017**.

## 2019–2024 Phase II Permit Requirements

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

1. Implement an ordinance that addresses runoff from new development, redevelopment, and construction sites and adopt minimum requirements, thresholds and definitions in Appendix 1 of the Phase II Permit or approved program and amendments by **December 31, 2021**.
2. Review all stormwater site plans for proposed development activities.
3. Conduct inspections of construction sites prior to clearing and construction, during construction, and upon completion of construction.
4. Provide a link to state stormwater general permit NOI forms for construction and industrial sites.
5. Conduct ongoing training for staff responsible for implementing the program to control stormwater runoff from new development, redevelopment, and construction sites.

## Planned Activities

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

<b>Table 6-1. Planned Activities to Control Runoff from New Development, Redevelopment, and Construction Sites.</b>			
<b>Activity</b>	<b>Tasks</b>	<b>Lead</b>	<b>Proposed Schedule or Frequency</b>
Staff training	Pursue training opportunities for plan review and inspection staff.	CED Planning	Ongoing
Stormwater site plan review	Review all stormwater site plans for proposed development activities in accordance with the City of Renton Surface Water Design Manual.	CED Development Engineering (private) and Capital Improvement Program (CIP) Lead (public)	Ongoing
Preconstruction inspections	Inspect construction sites prior to construction if they exhibit high sediment transportation potential.	CED Development Engineering and CED Planning	Ongoing
Construction inspections	Inspect all sites during construction to verify proper installation and maintenance of required erosion and sediment controls.	CED Construction Inspectors and CED Building Inspectors	Ongoing
Post-construction inspections	Inspect all sites after construction to ensure proper installation of permanent stormwater facilities, verify that maintenance plan is complete and maintenance responsibility assigned.	CED Construction Inspectors and CED Building Inspectors	Ongoing
Development site enforcement	Implement enforcement strategy for sites that are not in compliance	CED Construction Inspectors, CED Building Inspectors, Code Compliance	Ongoing
Review and adopt program amendments	Review and adopt amendment requirements into the city’s Surface Water Design Manual and applicable codes.	CED Development Engineering, CED Planning and SWU Engineering	Before December 31, 2021
Notice of Intent availability	Make copies of the “Notice of Intent for Construction Activity” forms available to representatives of proposed new development and redevelopment.	CED Development Engineering	Ongoing

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# OPERATIONS AND MAINTENANCE

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

## 2013–2018 Phase II Permit Requirements

Section S5.C.5 of the 2013-2018 Phase II Permit requires the city to develop and implement an O&M program with the ultimate goal of preventing or reducing pollutant runoff from the municipal separate stormwater system and municipal O&M activities. The specific Phase II Permit requirements are as follows:

1. Implement maintenance standards that are at least as protective as those specified in Ecology's *Stormwater Management Manual for Western Washington*.
2. Perform annual inspections of all city-owned or operated permanent stormwater treatment and flow control BMPs/facilities, other than catch basins, and take appropriate maintenance actions.
3. Spot check potentially damaged permanent treatment and flow control BMPs/facilities (other than catch basins) after major storm events; and conduct maintenance and repairs as needed.
4. Perform routine catch basin and inlet inspections. Clean as needed based on maintenance standards.
5. Implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the city and road maintenance activities under the functional control of the city.
6. Implement an ongoing training program for city staff whose primary construction, operations, or maintenance job functions may impact stormwater quality.
7. Implement Stormwater Pollution Prevention Plans (SWPPPs) for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the city.
8. Maintain records of inspections and maintenance or repair activities.

## 2019–2024 Phase II Permit Requirements

Section S5.C.7 of the 2019-2024 Phase II Permit requires the city to implement an O&M program with training to prevent or reduce pollutant runoff from municipal O&M activities. The specific Phase II Permit requirements are as follows:

1. Implement maintenance standards that are at least as protective as those specified in Ecology's *Stormwater Management Manual for Western Washington*. No later than **December 31, 2021**, update maintenance standards as needed.
2. Implement provisions to verify adequate long-term operation and maintenance (O&M) of stormwater treatment and flow control BMPs/facilities.
3. Conduct annual inspections of all stormwater treatment and flow control BMPs/facilities that discharge to the stormwater system and were permitted by the City since 2010 (unless maintenance records justify a reduced inspection frequency).
4. Conduct inspections of all stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every six months until 90% of the lots are constructed.
5. Perform annual inspections of all city-owned or operated permanent stormwater treatment and flow control BMPs/facilities, other than catch basins, and take appropriate maintenance actions (unless maintenance records justify a reduced inspection frequency).
6. Spot check potentially damaged permanent treatment and flow control BMPs/facilities (other than catch basins) after major storm events; and conduct maintenance and repairs as needed.
7. Perform routine catch basin and inlet inspections. Clean as needed based on maintenance standards.
8. Implement and document practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the city and road maintenance activities under the functional control of the city.
9. Implement an ongoing training program for city staff whose primary construction, operations, or maintenance job functions may impact stormwater quality.
10. Implement Stormwater Pollution Prevention Plans (SWPPPs) for all heavy equipment maintenance or storage yards and material storage facilities owned or operated by the city.
11. Maintain records of inspections, maintenance, repair, and enforcement activities.

## Planned Activities

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

<b>Table 7-1. Planned Municipal Operations and Maintenance Activities.</b>			
<b>Activity</b>	<b>Tasks</b>	<b>Lead</b>	<b>Proposed Schedule or Frequency</b>
Maintenance standards	Implement maintenance standards and perform maintenance per required schedule.	SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	Ongoing
Review and adopt new maintenance standards	Review the latest Ecology <i>Stormwater Management Manual for Western Washington</i> and King County SWDM and determine which maintenance standards to adopt.	SWU Engineering, SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	Before December 31, 2021
Stormwater facility maintenance provisions	Review long-term operations and maintenance provisions and update if needed.	SWU Engineering	Before August 1, 2019
Private stormwater facility inspections	Annually inspect private stormwater facilities constructed since February 2010. Identify maintenance needs and enforce maintenance standards.	SWU Engineering	December 31, 2019
Residential construction inspections	Inspect stormwater facilities and catch basins every six months until 90% of lots are constructed. Identify maintenance needs and enforce maintenance standards.	SWU Engineering	Ongoing
Stormwater treatment and flow control facility/BMP inspections	Ongoing inspection program for city-owned or operated stormwater facilities. Identify maintenance needs and maintain facilities.	SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	December 31, 2019
Stormwater treatment and flow control facility/BMP spot checks	Spot check inspections and as-needed maintenance for city-owned or operated stormwater facilities. Identify maintenance needs and maintain facilities.	SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	Ongoing
Catch basin inspection program	The Facilities Division and Airport Section implement standard approach.	Facilities, Airport	August 1, 2019 and every two years thereafter
Catch basin inspection program	The Parks & Trails/Golf Course Divisions implement Option 2 (inspections on a “circuit basis”).	Parks & Trails, Golf Course	August 1, 2019 and every two years thereafter

**Table 7.1 Planned Municipal Operations and Maintenance Activities. (cont.)**

Catch basin inspection program	The Surface Water Maintenance Division implements Option 3 (cleaning all pipes, ditches, catch basins, and inlets once during the permit term).	SW Maintenance	Before July 31, 2024
Maintenance procedures	Implement and document O&M practices, policies and procedures.	SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	Ongoing; document no later than August 1, 2019
Staff training	Pursue training opportunities for maintenance staff.	SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	Ongoing
Stormwater Pollution Prevention Plan (SWPPP)	Implement the SWPPP for the Maintenance Shops Facility.	Public Works Maintenance	Ongoing
Record keeping	Utilize a Maintenance Management System (MMS) to record time and resources spent on all O&M activities, tracking of inspections, and maintenance performed.	SW Maintenance, Parks & Trails, Golf Course, Facilities, Airport	Ongoing

# SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

This section describes the Source Control Program for Existing Development Phase II Permit requirements, as well as the city's planned compliance activities. There are no requirements or planned activities under the 2013-2018 Phase II Permit.

## 2019–2024 Phase II Permit Requirements

Section S5.C.8 of the 2019-2024 Phase II Permit requires the city to apply operational and structural BMPs, and treatment BMPs if needed, to existing sources, inspect and enforce BMP implementation at commercial and industrial properties, apply and enforce local ordinances at sites, and implement practices to reduce polluted runoff from pesticide, herbicide, and fertilizer applications. The specific Phase II Permit requirements are as follows:

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

## Planned Activities

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

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

# TOTAL MAXIMUM DAILY LOAD REQUIREMENTS

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

## 2013–2018 and 2019-2024 Phase II Permit Requirements

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

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

## Planned Activities

The city is currently not affected by any TMDLs listed in Appendix 2 of the NPDES Phase II Permit.

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# MONITORING

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

## 2013–2018 Phase II Permit Requirements

Section S8 of the 2013-2018 Phase II Permit requires the city to do the following:

1. Provide a description of any stormwater monitoring or stormwater-related studies conducted during the reporting period
2. Pay into a collective fund to implement a Regional Stormwater Monitoring Program (RSMP) that includes the following three components:
  - Status and trends monitoring
  - Stormwater management program effectiveness studies
  - Source identification and diagnostic monitoring

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

## Planned Activities

The city decided to opt in to the RSMP and started contributing to the RSMP fund beginning in August 2014. Annual payments into the RSMP, begun in August 2014, include the following:

- Status and trends monitoring: \$21,055
- Stormwater management program effectiveness studies: \$35,082
- Source identification and diagnostic monitoring: \$3,253
- **Annual Total: \$59,390**
- **2013-2018 Phase II Permit Total: \$237,560**

## 2019–2024 Phase II Permit Requirements

Section S8 of the 2019-2024 Phase II Permit requires the city to do the following:

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

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

## Planned Activities

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

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

# REPORTING

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

## 2013–2018 and 2019-2024 Phase II Permit Requirements

Section S9 of the 2013-2018 Phase II Permit and 2019-2024 Phase II Permit list the following requirements:

1. Submit an annual report to Ecology no later than March 31 of each year (beginning in 2015 and 2020 for the 2013-2018 Phase II Permit and 2019-2024 Phase II Permit, respectively).
2. Keep all records related to the NPDES Phase II Permit and the SWMP for at least 5 years.
3. Make records related to the NPDES Phase II Permit and the SWMP available to the public at reasonable times during business hours.

## Planned Activities

The city plans to meet all of the reporting requirements outlined in the 2013-2018 Phase II Permit and 2019-2024 Phase II Permit. Coordination mechanisms to be implemented in 2019 are described in Appendix A.

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# APPENDIX A

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## Coordination Mechanisms

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## External Coordination Mechanisms

The city plans to coordinate with adjacent jurisdictions as needed to control pollutants between physically interconnected MS4s and coordinates stormwater management activities to avoid conflicting plans, policies and regulations starting on August 1, 2019.

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

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

## Internal Coordination Mechanisms

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

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

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

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