



City of Tukwila

2013 Update

Stormwater Management Program

(SWMP)

Prepared By

City of Tukwila
Public Works Department

Permit #WAR04-5544

City of Tukwila

Stormwater Management Program

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1. INTRODUCTION

The National Pollutant Discharge Elimination System (NPDES) permit program is a requirement of the federal Clean Water Act. The federal Environmental Protection Agency (EPA) has delegated permit authority to state environmental agencies. In Washington, the NPDES delegated permit authority is the Washington State Department of Ecology (DOE).

This document was prepared by the City of Tukwila to meet the requirements for a Stormwater Management Program (SWMP) as required by the NPDES Phase II Permit. The SWMP was developed to outline the reduction of pollutant discharges from the City's Municipal Separate Storm Sewer System (MS4).

The Permit allows discharge of stormwater runoff from municipal drainage systems into the state's water bodies (i.e., streams, rivers, lakes, wetlands, etc.) as long as municipalities implement programs to protect water quality by reducing the discharge of "non-point source" pollutants to the "maximum extent practicable" (MEP). In addition, the City must meet "all known and reasonable treatment" (AKART) through application of Permit specified "best management practices" (BMPs). The practices specified in the Permit are collectively referred to as the SWMP and grouped under the following program components:

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

The Permit requires that the City report annually (by March 31 of each year) on the SWMP implementation from the prior year. The Permit also requires submittal of documentation that describes proposed program activities for the coming year. As of December 31, 2012, the City met the Permit requirements.

2. NPDES PHASE II PROGRAM COMPONENTS

Tukwila is defined as a Phase II community by DOE and, therefore, mandated to comply with the requirements of the Phase II National Pollution Discharge Elimination System (NPDES) Stormwater Permit. Phase II communities are those that:

- Own and operate a storm drain system
- Discharge to surface waters of the state
- Are located in urbanized areas
- Have a population of more than 1,000

As such, Phase II refers to permits that cover the state's second most populated areas with Phase I permits having the most populated areas.

As a Phase II community, Tukwila applied for and was issued a NPDES Phase II Stormwater Permit January 17, 2007, modified June 17, 2009 and expired February 15, 2012. DOE extended the Permit for a period of one year, with no modifications in July 2012. The Permit will be replaced with an updated NPDES Phase II Stormwater Permit August 1, 2013 which will expire July 31, 2018.

As stated, the major program components listed in the Permit are as follows:

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

The following sections describe each of the program components and how the City is currently addressing each requirement and the City's future planned activities. In general, the City of Tukwila is currently performing all required NPDES Phase II Permit activities and has programs in place to address the updated Permit requirements.

2.1 PUBLIC EDUCATION AND OUTREACH

2.1.1 Permit Requirements

Section S5.C.1 of the Phase II permit requires that the City provide an educational and outreach program for the area served by its MS4 no later than 2/15/2009. The purpose of this program is to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts. The educational program will target audiences including: the general public, businesses and industries, elected officials, policy makers, planning staff, engineers, maintenance staff, and other City employees. Records of public education and outreach activities including measurements of understanding and adoption of targeted behaviors need to be tracked and maintained throughout the Permit's duration.

2.1.2 Current Activities

The City currently has an active public educational and outreach program that uses a variety of approaches to inform residents and businesses about stormwater related pollution-prevention activities. The City uses many resources for educational information such as DOE's Hazardous Waste and Toxics Reduction Program, Environmental Protection Agency's Region 10 Pacific Northwest, King County's Department of Natural Resources and Parks, Water Resource Inventory Area 9, and local environmental organizations. The City's current educational activities consist of the following:

1. Water Course Signing:
 - The City has placed and maintains signs at all stream crossings to educate pedestrians and motorists of the location of local streams. Signs identify the stream name and read "This Stream Is In Your Care."
2. Catch Basin Labeling:
 - All new public or private catch basins are required by City standards to be labeled with either torch down pavement decal stating "Dump No Waste - Drains to Stream," or glue down metal marker stating "No Dumping Drains to River."
 - All paving projects, both private and public, that pave around an existing catch basin are required to label all catch basins with the torch down decal or metal pavement markers.
 - Currently, the City's Maintenance Department has installed over 3,000 glue down metal pavement markers that states, "No Dumping – Drains to River".
 - All inlet castings are required by City standards to be labeled "Outfall to Stream - Dump No Pollutants."
3. City Newsletter and Newspaper:

The City of Tukwila publishes the Hazelnut (newsletter) 3 times a year and a monthly Tukwila Reporter (newspaper) that includes articles concerning stormwater related topics. Typical topics covered include:

 - Car Washing
 - Illegal dumping of materials in storm drains
 - Landscape chemicals
 - Proper disposal and methods of reducing household hazardous wastes
 - Notices for public participation in the Surface Water Management Program
 - NPDES Permit updates
4. Water Quality Brochures:

The Public Works Department has brochures and handout materials available and on display that include the following topics:

 - Spill Kit Pilot Program, Stormwater Education for Businesses
 - Puget Sound Shoreline Stewardship Guidebook
 - Disposing of Hazardous Wastes Information Card
 - Hazardous Waste Directory
 - Ecology - Shoptalk, Spills-Who Do You Call?

- Antifreeze Recycling
- EPA’s Information Sheet Regarding Oil/Water Separators
- Automotive and the Do It Yourselfer
- Puget Sound Shoreline Stewardship Guidebook
- Ecology – Five Steps to Natural Yard Care
- Pet Waste Brochures that specifically address Stormwater Pollution Prevention
- Carpet cleaning
- Rain Garden Handbook for Western Washington Homeowners
- Concrete Washout Area Best Management Practice
- Your Septic System

5. User Surveys:

The City conducts annual surveys to a targeted audience that measures the public’s understanding of surface water related topics. For 2012, the City conducted a phone survey titled “2012 Assessment of Citizen Understanding and Adoption of Targeted Stormwater Behaviors”. The goal was to measure the public’s knowledge and practices regarding stormwater in the City of Tukwila. The results of this survey and previous surveys can be found on the City’s NPDES webpage: www.tukwilawa.gov/pubwks/npdes.html information obtained from the survey will be used to guide future education and outreach programs.

6. Regional Outreach:

Participate in the King County’s regional outreach forum, STORM, on an ongoing basis to share ideas on public education efforts.

7. The City uses its inspection program for an opportunity to provide stormwater education to facility operators giving them a better understanding of the purpose of our Phase II Permit.

8. The City has initiated an elementary school stormwater educational series that involves students from Tukwila Elementary School’s 5th grade science classes.

9. Led by Boeing Employees Credit Union (BECU), the City partnered with Forterra, CBR and Tukwila businesses, in a “Restore the Duwamish Shoreline Challenge” campaign aimed at restoring the riverbanks of the Duwamish River. Funding provided by BECU, King Conservation District and CBR. The City provided technical support, equipment and plantings.

10. The City continued with its Cottage Creek Restoration project at City Hall. Public participation, City officials and staff helped with the success of the project. Funding for this phase was provided by a grant from King County Conservation District.

2.1.3 Planned Activities

The City will continue all current public education and outreach activities listed above and continue with the following activities in 2013:

- Provide Water Quality Brochures.
- Continue environmental Stewardship programs.
- Continue to publish stormwater articles in the Tukwila Reporter.
- Continue to use the Hazelnut (newsletter) for outreach purposes.
- Continue with the Annual curbside collection event.
- Residential Recycling Collection Event.
- Distribution of King County Drainage Maintenance Standards for Commercial and Multi-Family Drainage Facilities.
- Continue the development of an Elementary School Educational Series.
- Continue with a Stormwater Community Survey.
- Car Wash activities will continue to be directed to the Multi-Family Residences i.e., apartment and condominium properties.
- Continue to install storm drain markers at new catch basins maintained by the City, including requiring markers at privately owned catch basins.
- Provide a SWMP booth with various educational handouts at the City's annual Backyard Wildlife Festival. Also, provide educational handouts for an upcoming Comprehensive Land Use Plan community meeting.
- Continue stormwater education while conducting stormwater and related inspections.
- Expand an education and outreach series regarding Low Impact Development targeting the general public (including school age children), businesses, and the development related community.
- Continue with restoration and stewardship of Cottage Creek.
- Continue with "Restore the Duwamish Shoreline Challenge".
- The City will continue with its public outreach program providing BMPs directed to the multi-family residences (condominium and apartment rental properties).

2.2 PUBLIC INVOLVEMENT AND PARTICIPATION

2.2.1 Permit Requirements

This program component requires that the City include ongoing opportunities for public involvement through advisory councils, committees, and participation in developing rate structures and environmental activities. In addition, the public will have opportunities to aid in the City's development of the City's SWMP annual report(s) and other submittals.

2.2.2 Current Activities

The City has several ongoing public involvement and participation activities that compliment and work with the City's public education and outreach activities. These activities include the following:

1. City Website:

The City makes available all required permit submittals as well as stormwater planning documents for public information and comment. Posted information includes:

- General NPDES Information
- Annual NPDES Reports
- Annual SWMP Updates
- City Infrastructure Design and Construction Standards
- Illicit Discharge Contact Information
- Council and Committee Agenda
- City News Articles
- Surface Water Surveys and Studies

2. Public Meetings:

The City uses the following public meetings for all contracts, required submittals, programs, and budgets related to NPDES:

- City Council
- Committee of the Whole
- Utilities Committee
- Workshops
- Meetings requested by citizens

2.2.3 Planned Activities

The City will continue all current public involvement and participation activities listed above. The City will update all required NPDES information including the 2013 SWMP and 2012 Annual Report on its website www.tukwilawa.gov/pubwks/npdes.html by March 31 of each year. Any other submittals required by the Permit will also be posted as necessary on the website. In addition to these current activities, the City will add the following activities:

1. Continue to offer informal environmental stewardship training when the opportunity presents itself through hands-on restoration activities. This program element will provide training for citizens and city staff who want to learn how to care for wetlands, streams and buffers.
2. Continue with the Pet Waste Program and invite dog owners to participate in the publication of brochures using their dog's photos.
3. Continue to conduct Stormwater Community Surveys.
4. The City is beginning work to incorporate urban forestry planning and policies into the Comprehensive Plan and updates of regulations, which will include focusing on the beneficial effects on stormwater management.

5. Continue to provide opportunities for the public to participate in the decision-making process involving the development, implementation, and update of the SWMP.
6. Update the City's website when new information becomes available.

2.3 ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

2.3.1 Permit Activities

The City is required to implement an ongoing program to detect and remove illicit connections, discharges, and improper disposal, including any spills not under the purview of another responding authority, into a MS4 owned or operated by the City. The goals and requirements of the program are as follows:

- Develop a municipal storm sewer system map that includes information on the City's MS4 (for example, outfalls, receiving waters, connection points, and areas that don't discharge to surface water, etc.).
- Effectively prohibit, through ordinance or other regulatory mechanism, non-stormwater, illegal discharges, and dumping into the City's MS4, including locating priority areas likely to have illicit discharges.
- Develop and implement a program to detect and address non-stormwater discharges, spills, illicit connections, and illegal dumping into the City's MS4.
- Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper waste disposal.
- Implement procedures for program evaluation and assessment which includes a program to track spills and illicit discharges (both number and type), record inspections made and any feedback received from public education effort.
- Provide appropriate training to city employees on IDDE into the City's MS4.
- Establish a hotline number for public reporting of spills and other illicit discharges. Maintain a record of all calls received and actions taken.

2.3.2 Current Activities

The City has completed the elements required for an IDDE program and other programs will be developed as required. Current activities include the following:

1. **Outfall Mapping:**
The City began a geographic system (GIS) mapping program in 2003 and to date, has mapped all receiving water body outfalls, all public surface water pipes 8" and larger that includes information such as pipe invert, material, and its condition. All GIS information is added to the City's GIS Database and will continue to be refined as needed. The information is also provided upon request to the public.
2. **Reporting Spill Hotline:**
The City has an advertised reporting phone number, (206) 433-1860, where illegal dumping and spills can be reported and is functioning as expected.

3. Training Program:

The City has an ongoing training program that consists of the following activities:

- Maintenance & Operations training was conducted in August 2009 that included three subjects: Pollution Prevention and Operations and Maintenance, Illicit Discharge Detection and Elimination (IDDE) Awareness, and IDDE Response.
- Parks & Golf personnel training was conducted in June 2010 NPDES Good Housekeeping.
- Staff training for office personnel was conducted in June and November 2011 on multiple stormwater subjects that included SWPPP, TMDL and BMPs.
- Maintenance & Operations training was conducted in August 2012 that certified four key personnel as CESCL's.
- Public Works training was conducted that included all operations in April 2012 on NPDES Illicit Discharge & Spill Response.
- Key Planning Department and Public Works staff training was conducted in September 2012 on Low Impact Development & Basic Biofiltration.

4. Video Inspection:

The City's Surface Water Maintenance's inspection program is divided into five zones. Video equipment is used to inspect storm water piping in these zones. This 2012 reporting period consisted of condition based video inspections. Illegal pipe connections and questionable discharges are investigated and corrective measures are taken when warranted. In addition, maintenance needs are identified and addressed as warranted.

5. Car Wash Program:

As part of the City's ongoing public education program, a SudSafe Car Wash program is in place. All organized charity car washing events must follow this program. In addition, facilities without a commercial wash base are allowed the use of a sudsafe car wash kit providing the discharge is limited to the sanitary sewer and or an appropriate vegetated pathway.

6. IDDE Ordinance:

The City adopted a new IDDE Ordinance on February 16, 2010 that fully complied with NPDES Permit requirements.

7. Industrial and Commercial Inspection Program:

The City has an inspection program that targets businesses with potential pollution generating activities. This program includes joint inspections at various times with DOE Hazardous Waste, Local Source control and Urban Waters inspectors.

8. Multi-Family Properties:
The City has been contacting owners and/or managers of condominiums and apartments by mailing a “Notice of Stormwater Management Maintenance Standards and Requirements.” The requirements consists of BMPs from the 2009 King County Surface Water Design Manual and Stormwater Pollution Prevention Manual.

2.3.3 Planned Activities

The City will continue all current IDDE activities listed above. In addition to these activities, the City will implement the following activities in 2013:

1. Outfall Mapping:
The City will continue with the GIS mapping program that will include the transfer of accumulated information to the City GIS database.
2. Monitoring:
Continue with monitoring the prioritized Receiving Waters. These are three outfalls, one within the Green River and two within the Duwamish River, for visual inspection and for potential future testing. The characteristics of the outfalls are:
 - Strander Boulevard – This outfall drains a portion of the Tukwila Urban Center which is a highly developed commercial center. The discharge area contains primarily office and retail businesses as well as City storm drainage.
 - Duwamish Neighborhood – This outfall drains the Duwamish neighborhood which is primarily made up of single family residences and City roadways. The area is an older neighborhood and surface waters are routed through a stormceptor prior to discharging into the Duwamish River.
 - South 104th Outfall – This outfall drains industrial facilities along a portion of East Marginal Way South. Surface waters are discharged into the Duwamish River without treatment.
3. Training Program:
The City will continue its staff training program that will consist of the following activities:
 - Training for all new employees and any additional field personnel missed during the last training session.
 - Staff training for new techniques and procedures as they become known.
 - Staff training for Maintenance and Operation personnel on BMPs compliance measures. In addition, Certified Erosion and Sediment Control Lead training will occur for those personnel that are directly involved with construction activities.

4. Reporting Spill Hotline:
The City will continue to evaluate the existing spill hotline procedures to determine if this method is working as intended and modify the procedure if necessary.
5. Industrial and Commercial Storm Drainage:
The City will continue with its industrial and commercial storm drainage and maintenance inspection program by targeting businesses located in its Tukwila Urban Center.

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

2.4.1 Permit Requirements

The Phase II Permit requires that the City develop, implement, and enforce a program to reduce pollutants in stormwater runoff to its MS4 from any new development, redevelopment, and construction site activities. The minimum elements included in this program are:

- An ordinance or other regulatory mechanism to address runoff from new development specifications may require smaller sites to comply with these requirements as well.
- Develop and implement a permit process with plan review, inspection, and enforcement capability including adequate long-term operation and maintenance of the stormwater facilities and infrastructure.
- Develop and implement procedures for documenting inspections and enforcement actions.
- Make copies of the *Notice of Intent for Construction Activity* and *Notice of Intent for Industrial Activity* available for new development and redevelopment representatives.
- Develop and implement a training program for staff responsible for implementing the program to control stormwater runoff from new development, redevelopment and construction sites including permitting, plan review, construction site inspection, and enforcement.

2.4.2 Current Activities

The City has an active program to reduce pollutants in stormwater runoff from new development, redevelopment, and construction site activities. The existing program applies to both public and private projects, including roads. The current compliance activities associated with the above permit requirements are summarized below:

The City amended city codes and revised standards to meet permit requirements for development, redevelopment, construction and post-construction stormwater management, including escalating enforcement provisions for illicit discharge originating from construction sites. The development related codes became effective February 15, 2010 which were included in Ordinances 2274 and 2275.

In summary, for the purpose of development and redevelopment the City follows the listed items:

1. **Design Standards:**
The City uses the minimum design standards of the 2009 King County Surface Water Design Manual with an option to use DOE's Surface Water Management Manual for Western Washington.
2. **Construction Site Inspection:**
All sites are inspected by the City prior to the start of construction. The City tracks and maintains inspection records and enforcement actions by staff.
3. **Construction Standards:**
City's Infrastructure Design and Construction Standards, and WSDOT Standard Specifications for Road, Bridge, and Municipal Construction are used for construction standards.
4. **Enforcement:**
Tukwila Municipal Code Chapter 8.45 provides for a system of escalating enforcement procedures necessary to sustain the existing codes and standards throughout the construction and development process.
5. **Notice of Intent:**
The City provides Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity to representatives of proposed new development or redevelopment projects.
6. **Long-term operation and maintenance of stormwater control facilities is provided by ordinance whereby maintenance responsibility, standards and inspection procedures are addressed.**
7. **Runoff-control from project sites that require a Department of Ecology stormwater permit is also subject to City runoff-control requirements.**
8. **Appropriate staff members are CESCL qualified.**

2.4.3 Planned Activities

1. **Continuing with construction site visits and creating an open forum for:**
 - Discussing new types of pollution-prevention techniques
 - Educating project personnel of impacts of pollution
 - Educating targeted personnel on Best Management Practices (BMP)
2. **Continue with current efforts in controlling runoff by including the following elements:**
 - Continue staff training as necessary

- Continue to develop an education and maintenance follow-up program for private storm drainage facilities approved prior to the current NPDES Phase II permit
- Prepare for future adoption by ordinance Low Impact Development measures

2.5 POLLUTION PREVENTION AND OPERATION AND MAINTENANCE FOR MUNICIPAL OPERATIONS

2.5.1 Permit Requirements

This minimum control measure requires that the City provide a pollution prevention and operation and maintenance program including a training component that has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. All elements of the operations and maintenance program were required to be in place by February 16, 2010. The minimum elements included in this program component are:

1. Establishment of maintenance standards that are as or more protective of facility functions than those specified in Chapter 4 of Volume V of the 2005 Stormwater Management Manual for Western Washington. The purpose of the maintenance standards is to determine if maintenance is required on a particular facility or structure. If maintenance is deemed necessary during inspection, the following schedule is required for completion of the required maintenance:
 - Within 6 months for typical maintenance
 - Within 9 months for maintenance requiring re-vegetation
 - Within 1 year for wet pool facilities and retention/detention pond
 - Within 2 years for maintenance that requires capital construction of less than \$25,000
2. Develop and implement an operations and maintenance (O&M) program with the ultimate goal of preventing or reducing pollutant runoff from municipal separate stormwater system and municipal operations and maintenance activities.
3. Perform required inspections of stormwater facilities on a regular basis. Inspections will be documented with the work needed or completed on the stormwater facilities according to the Permit requirements for reporting.
4. Develop a program to reduce the stormwater impacts from streets, parking lots, roads, highways, and other lands owned, operated or maintained by the City, including road maintenance.
5. Develop and implement an on-going training program for employees whose job functions may impact stormwater quality.
6. Develop a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance yards and material storage facilities owned or operated by

the City that is not required to have coverage under the Industrial Stormwater General Permit.

2.5.2 Current Activities

The City has an active pollution prevention and operation and maintenance program implemented by the City's Surface Water Maintenance Division. This program includes the following activities:

1. **Catch Basin Inspection**
The City inspects all catch basins and inlets owned and operated by the City at least once before the end of the permit term (minimum 5-year rotating schedule). If the catch basin has over 6 inches of deposited sediment in the sump, it will be cleaned.
2. **Conveyance System Inspection/Cleaning**
The City's piped storm drainage system has been delineated into 5 zones by the Public Works staff. Pipe system maintenance is scheduled by zone, and each zone is maintained on a 3 to 5-year cycle. This includes repair of all pipes and catch basins, with particular attention given to chronic problem areas and areas for which complaints have been received from citizens.
3. **Flow/Water Quality Facilities**
The City inspects all City owned surface water flow control and water quality facilities within a three year cycle. Maintenance is performed on above ground facilities that include vegetative control every year. Maintenance is performed on below ground facilities that include structure repair and sediment removal once every three years. Maintenance is performed as needed through the current circuit or condition based inspection and compliant process.
4. **Drainage Complaints**
The City responds to all stormwater-related complaints. Complaints are submitted to the City through Requests for Action (RFAs), Environmental Report Tracking System (ERTS), City Council meetings, letters, e-mails, and telephone calls. These complaints are forwarded to the appropriate division and/or to the respective property owner/project site.
5. **Problem Areas**
Maintenance staff keeps an informal list of problem areas occurring in the City's drainage system. These problem areas are inspected and problems corrected after every major rainfall event. In addition, maintained every 3 to 5 years.

6. Video Inspection
The City maintains an annual closed circuit television (CCTV) inspection schedule of its existing pipeline system to help identify illegal connections to drainage systems, damaged, and obstructed sections of pipe. This information is used to schedule repairs and further investigate illicit discharges and connections.
7. Hazardous Material Spills
The City maintenance crews are often the first group to identify spills and respond to minor cleanup. Tukwila Fire Department responds to hazardous material spills. In the case of larger spills, the City will hire a qualified spill response contractor.
8. Training
To enhance the Maintenance and Operations Department, key personnel were CESCL certified. Maintenance & Operations training program is current to date.
9. SWPPP
A SWPPP is in place at heavy equipment maintenance yards and material storage facilities operated by the City.

2.5.3 Planned Activities

The City will continue with all programs and procedures currently in place. In addition to these, the City will conduct the following activities in 2013:

1. Procedural Review:
 - The City will continue to review and revise, when necessary, all current practices that reduce impacts from runoff or maintenance activities associated with municipally owned or operated streets, parking lots and facilities.
 - The City will continue to develop and implement a more formalized plan for inspection and documentation of all catch basins, inlets, stormwater treatment, and flow control facilities owned and operated by the City. The plan will include performing spot checks on potentially damaged permanent treatment and flow control facilities after major storm events.
 - The City will continue to review and revise, as necessary, its current Surface Water Pollution Prevention Plan.
2. The City will continue with the current training program for existing and new employees as needed and as new information and techniques become available.

2.6 MONITORING

2.6.1 Permit Requirements

For the current permit cycle, permittees are required to prepare for the implementation of a comprehensive long-term monitoring program under the next permit term. The program

includes two components: stormwater monitoring and targeted SWMP effectiveness monitoring.

The Permittees are not required to conduct water quality sampling or other testing during this permit term, with the following exceptions:

- Water quality monitoring required for compliance with TMDLs (Total Maximum Daily Pollutant Loads). Any sampling or testing required for characterizing illicit discharges pursuant to the Illicit Discharge Detection Elimination section of the permit.

2.6.2 Current Activities

The City currently has several of the elements required for a monitoring program in place and others will be developed as required. Current activities include the following:

1. A TMDL has not been established for the City of Tukwila, so monitoring is not required at this time. The Department of Ecology is currently conducting TMDL analysis of the lower Duwamish River.
2. Outfalls
The City has developed and maintains a map of all MS4 outfalls as part of our GIS mapping program.
3. The City has prioritized three receiving waters for visual inspections and will continue with its monitoring.

2.6.3 Planned Activities

As required by the updated Phase II Permit, effective August 1, 2013, the City needs to decide, seek approval from the City Administrator and notify DOE in writing by December 1, 2013, whether the City will conduct on its own or pay into, a collective fund supporting a Regional Stormwater Management Program on each of the following:

1. Status and Trends Monitoring.
2. Effectiveness Studies.
3. Source Identification and Diagnostic Monitoring.

The City will continue with all programs and procedures currently in place. In addition, the City will conduct the following activities in 2013:

Monitoring Plan:

1. Conduct field assessment on at least one high priority water body.
2. Continue to participate in the regional, state, and local monitoring forums to develop and integrate monitoring and assessment requirements.

3. CONCLUSION

This Surface Water Management Program has been prepared to demonstrate compliance with the requirements of the NPDES Phase II Permit and outline planned activities for 2013. There are multiple tasks the City is undertaking to align itself with the current Permit and updated Permit requirements and elements that need to be accomplished and built upon. This SWMP will be a working document with updates until the final plan is to be completed by the recent extended date of July 31, 2018.

The Public Education and Outreach Program has been implemented and opportunities exist to expand on the current program that reaches out with useful information that benefits the general public, business district, and industrial community. In addition, the Outreach Program allows for interaction and gives recognition to those in the community that help meet the components of the SWMP.

Public Involvement and Participation, though limited, continues to grow. The City encourages the public to take part with those already involved.

Illicit Discharge Detection and Elimination Program is in place and will continue to with staff training, enforcement of the IDDE ordinance, and distribute additional educational materials.

The City is current with implementation of controlling runoff from new development, redevelopment, and construction sites.

The Operation and Maintenance program has been enhanced with additional CESCL training and advancement of key personnel. A Senior Maintenance and Operation Specialist is now dedicated for the City's response to any illicit discharges into the storm drainage system.

Additional information on the City's NPDES program can be found online at <http://www.tukwilawa.gov/pubwks/npdes.html>.

The public is encouraged to participate in the development of the SWMP. Please contact Greg Villanueva of the Public Works Department with questions, comments, or ideas at:

Mail: Greg Villanueva
NPDES Coordinator
City of Tukwila
Department of Public Works
6300 Southcenter Blvd. Suite 100
Tukwila, WA 98188-8548
Phone: 206-431-2442

Email: greg.villanueva@tukwilawa.gov

Website: www.tukwilawa.gov/pubwks/npdes.html

(W: PW Eng/Projects/A-DR/93-DR10/2012 Annual Report/SWMP 2013)